



St Asaph Solar Farm, Cefn Meiriadog, St Asaph

Planning, Design and Access Statement

On behalf of **Anesco Ltd**

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Executive summary

1. This Planning, Design and Access Statement (PDAS) has been prepared by Stantec UK Ltd on behalf of Anesco (the 'Applicant') to accompany a full application for the construction, operation and decommissioning of a ground mounted photovoltaic (PV) solar farm, together with associated equipment, infrastructure and ancillary works (the 'Development') on land at Cefn Meiriadog, St Asaph, Denbighshire (the 'Site').
2. The Development comprises an electricity generation station with an installed generating capacity of between 10 and 350 MW, it falls within the definition of a 'Development of National Significance' (DNS) under section 4(1) of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended), for the purposes of section 62(D) of the Planning (Wales) Act 2015 ('the Wales Act'). Section 62(D) of the Wales Act States that:

(3) "Development is of national significance for this purpose if it meets criteria specified regulations made by the Welsh Ministers for the purposes of this section".
3. The application is therefore made to the Welsh Ministers instead of the Local Planning Authority (LPA) which in this case is Denbighshire County Council (DCC). This planning application description is:

'Construction, operation and decommissioning of an 18.44MW ground mounted photovoltaic solar farm, with associated equipment, infrastructure and ancillary works '
4. It would be installed for a temporary 40-year period after which the site would be returned in full to its existing agricultural use.
5. The project has an agreed grid connection at St Asaph substation and can make a very meaningful contribution to statutory climate change and net zero targets. This includes:
 - Providing 18.44MW of clean energy to the grid
 - Generating sufficient electricity to power 4,777 homes
 - Saving 4,267 tonnes of carbon compared to traditional fossil fuel
 - Supporting the step change increase in locally generated energy
 - Providing greater UK generated energy security, thereby reducing the reliance on volatile overseas markets
6. National policy in Wales is clear that decision makers must give significant weight to Wales' need to meet its international commitments, and its target of generating 70% of consumed electricity by renewable means by 2030 (currently being consulted on revised energy target (100% by 2035)). The proposed development is fully compliant with the principles of national policy.
7. The development is also in accordance with Planning Policy Wales Edition 12 (PPW) (2024) and LDP policy VOE 10, relating to the location of renewable energy development.
8. A range of other notable benefits will be realised by the development including:
 - Significant biodiversity gains.
 - Provision of extensive landscaping, hedgerows and tree planting.

- Introducing an economically beneficial use
 - Creating local jobs during installation and operation
 - Financial investment which supports the local, regional, and national economy
9. An EIA Screening Direction from PEDW in February 2025 concluded that the project was EIA development and therefore an ES is required in relation to landscape character and visual amenity only. The ES is based on the matters identified in the Screening Direction, and has been undertaken in accordance with the EIA Regulations.
10. The application follows extensive design development, including in 2024 the wholesale review of the site following initial technical advice. The most recent layout has been reviewed to maximise tree retention and responds to ecological enhancement opportunities. Notably this includes removing panels within the western fields to avoid overlap with the recently consented Mona Offshore Wind project. Therefore a comprehensive and thorough approach has been taken.
11. The project has been subject to statutory and non-statutory consultation, with statutory consultation (at the Pre-Application Consultation stage) being undertaken in accordance with the relevant Regulations and following notification and consultation with the necessary stakeholders and interested parties. The response to the PAC is set out in the PAC Report.
12. This PDAS is based on a suite of technical documents that accompany the planning application, and which should be read in conjunction with this PDAS. In particular, the following documents are referred to in this statement:
- Agricultural Land Classification (ALC) Survey;
 - Ecological Assessments;
 - Flood Consequences Assessment (FCA) and Surface Water Drainage Strategy;
 - Geophysical Survey Report;
 - Arboricultural Impact Assessment;
 - Historic Environment Desk-based Assessment (HEDBA);
 - Landscape and Visual Impact Assessment (LVIA);
 - Solar Photovoltaic Glint and Glare Assessment;
 - Transport Assessment & Construction and Traffic Management Plan (CTMP);
 - Environmental Statement (including a Non-Technical Summary).
13. The development will also be accompanied by a range of management plans which would be controlled by suitably worded conditions on any permission granted.
14. This PDAS shows the Proposed development is entirely in accordance with national and local policy

1 Introduction

1.1 Overview

1.1.1 This PDAS provides a background to the Development, together with a description of the site and surroundings and provides an assessment of the Development against the relevant national and local planning policy and other material considerations. It comprises the following sections:

- **Section 1: Introduction** – this section introduces the Applicant, the basic principles of the Development and the structure of this PDAS;
- **Section 2: Project Description** – this section describes the Site in more detail,
- **Section 3: Proposed development** – this section explains what is included within the planning application, and includes consideration of design and access;
- **Section 4: Pre – Application Dialogue** – this section includes pre application dialogue with Planning, Environment and Decisions Wales (PEDW), DCC and other relevant consultees. In addition, this section provides details with regard to the Environmental Impact Assessment Screening Direction issued in February 2025;
- **Section 5: Planning Policy Framework** – section 4 sets out the prevailing planning policy context, including national and local policy and guidance that is applicable to the Development;
- **Section 6: Design and Access Proposals** – this section of the PDAS sets out access into the Site, Character (including considerations of use, amount, layout, scale, appearance and landscaping, community safety, environmental sustainability);
- **Section 7: Assessment of the Development** – section 6 assesses the Development against the prevailing Planning Policy Framework, the Development Plan and other material considerations;
- **Section 8: Conclusions** – this section concludes and summarises the preceding sections.

1.2 The Applicant

- 1.2.1 Anesco Ltd develop, design, construct, operate, maintain and optimise high performing grid scale renewable energy assets. Anesco Ltd are one of the largest providers of energy efficiency services in the UK, working with major energy utilities to deliver home upgrades through their comprehensive network of installers. With a focus on renewables, energy storage and energy efficiency, Anesco Ltd are committed to enabling the transition to a net zero energy system.
- 1.2.2 Anesco were incorporated in 2010 and constructed the largest solar farm in Dorset less than a year later. In September 2014, Anesco connected the UK's first utility scale battery storage unit and six months later installed the largest optimised solar farm in Europe. In 2017, Anesco Ltd constructed the UK's first subsidy-free solar farm.
- 1.2.3 Anesco Ltd have become one of the largest providers of energy efficiency services under the Government's Energy Company Obligation (ECO) scheme. Anesco Ltd continues to develop, design, construct, operate and maintain high performing grid scale solutions, whilst being a trusted partner to large commercial clients and government departments.

2 Project Description

2.1 Site and Surroundings

- 2.1.1 The Site is located approximately 850m to the south-west of St Asaph, 700 metres to the south-east of St Asaph Business Park and approximately 500m to the south of Glascoed Road, which runs in an east west direction linking St Asaph and St Asaph Business Park. The Site boundary is located entirely within Denbighshire.
- 2.1.2 The Site is located within the Vale of Clwyd, a broad valley extending from Llanellidan in the south to St Asaph in the north. The Vale of Clwyd is bounded by the Clwydian Range of hills to the east and by gently rising landscape of Rhos Hill to the west.
- 2.1.3 The Development is split into two parcels approximately 230 metres apart: a western parcel (approximately 13.22 hectares) and an eastern parcel (approximately 20.32 hectares), equalling a total of approximately 35.53ha. References to the Site in this report are referring to both parcels together.
- 2.1.4 The Site is largely rural and agricultural, with mixed pastures and fields enclosed with mature and managed hedgerows, interspersed with pockets of mixed conifer woodland. The approximate centre of the western block is at grid reference SJ022729 and the approximate centre of the eastern block is at grid reference SJ026726. The Site lies approximately 60m above ordnance datum (AOD) at its highest point. It is within close proximity to a network of electricity transmission pylons which follow a broadly east-west alignment; with pylon strings passing directly across each of the parcels of land.
- 2.1.5 The wider road network surrounding the Site includes:
- The B5381 (Lower Denbigh Road / Glascoed Road / Roman Road), which runs broadly east/west between Trefnant and Conwy, at its nearest 540m to the north of the Site;
 - An unnamed lane, which runs broadly north/south between the eastern and western parcels;
 - A second unnamed lane, which runs broadly east/west to the south of the eastern parcel; and
 - A third unnamed lane, which runs along the eastern slopes of the Cefn Meiriadog ridge, 400m to the west of the western parcel.

2.2 Designations

- 2.2.1 The Natural Resources Wales' (NRW) Development Advice Map shows the Site is located in Flood Zone A. The main hydrology feature within the vicinity of the Site is the River Elwy, which is located approximately 1km to the east at its closest point and runs in a northerly direction towards the northern coast of Wales.
- 2.2.2 There are no heritage statutory designated assets located within the Site boundary. The closest are three Grade II Listed buildings; Southcroft including North Cottage, Staverton and Former Coach House, Stables & Outbuildings which are all located approximately 570m north of the western parcel of the Site. The Scheduled Monument of Bedd-y-Cawr hillfort is located approximately 675m to the south-west of the Site, which itself looks over the Lower Elwy Valley, a Registered Historic Landscape. Additional Listed buildings located within 1km of the Site boundary are listed below:
- 2.2.3 The St. Asaph Conservation Area is located approximately 1.3km to the north-east of the Site.

- 2.2.4 There are no PRow within the application site. 300 metres to the north of the site a number of PRowS run in an east-west / north-south direction providing linkages to population and existing recreation centres found at St Asaph. National Cycle Route 84 which runs from St Asaph to Rhyl is found 1.5km to the north-east of the site. Bridleway 208/3 lies closest to the site and is due northwest of the Site.
- 2.2.5 In terms of the agricultural land quality, the Welsh Government's Predictive Agricultural Land Classification (ALC) Map indicates that the land is classified as Grade 3b. An agricultural land quality survey has been undertaken, which confirms that 100% of the Site is classified as Grade 3b. As such, the land is not Best and Most Versatile (BMV) agricultural land.
- 2.2.6 Habitats within the Site mostly consist of non-botanically diverse natural grassland, modified grassland and arable fields containing cereal crops. Hedgerows form the boundaries of the majority of the fields and these are dominated by native species, but are low and narrow, typically managed by flailing. A line of mature oaks forms the Site boundary along the southern edge of the western block and the eastern block of the site.
- 2.2.7 There is an area within the Site that is listed as 'Plantation on Ancient Woodland Site'. This has been discussed within the Tree Survey and on the Tree Constraints Plan. There is also an area adjacent to the Site that is listed as 'Restored Ancient Woodland Site'.
- 2.2.8 The Site is not covered by any designations for landscape or scenic beauty. The area surrounding the Site includes the following:
- Special Areas of Conservation (SACs) – Coedwigoedd Dyffryn Elwy / Elwy Valley Woods SAC, located within 1km to the south of the Site boundary; and
 - Sites of Special Scientific Interest (SSSI) – Coedydd ac Ogofau Elwy a Meirchion SSSI, located within 1km to the south of the Site boundary;
- 2.2.9 One designated nature conservation site of international importance is located within 1km of the Site. Coedwigoedd Dyffryn Elwy / Elwy Valley Woods SAC, which lies to the south of the Site boundary is designated due to Tilio-Acerion forests of slopes, screes and ravines for which this is considered to be one of the best areas in the United Kingdom. Furthermore, the Site is designated as a SSSI for ecological interests and known as Elwy a Meirchion.

2.3 Planning History

- 2.3.1 The site has a limited planning history, prior to the current proposals. With previous applications relating to the nearby Burbo Bank offshore wind project.

Application	Decision	Decision Date	Description of Development
31/2014/1366	Approved	01/04/2015	Construction of additional temporary accesses, access tracks and construction compounds in association with Burbo Bank offshore windfarm onshore works consented under planning permission code no. 31/2013/0400.

3 The Development

3.1 The proposals

- 3.1.1 The Applicant is seeking temporary planning permission for the construction, operation and decommissioning of a ground mounted solar PV farm for a period of 40 years. An underground cable will link the Site to the St Asaph substation, which is approximately 1km to the north. The Development does not include any element of energy storage.
- 3.1.2 The development will include the following components:
- Series of PV modules mounted on a piled metal framework (array)
 - A DNO Substation approximately 4m in height and 5.7m x 5.7m
 - 2no Customer Substations approximately 4m in height and 6.5m in length x 4.2m in width located on either parcel of land
 - 5no Transformer Stations approximately 2.5m in height and measuring 6.1m x 2.5m located around the site
 - Access Track/Maintenance Track (Gravel);
 - Deer fencing;
 - Access gates;
 - CCTV cameras, facing inwards on approximate 2.5m to 3m high columns; and
 - Landscape mitigation through additional vernacular planting.

3.2 Evolution of the proposed development

- 3.2.1 As detailed within this PDAS the site has been subject to detailed and thorough assessment work since initial conception in 2021. This has included notable changes to the application area and proposed layout to remove land which due to shading issues, placing solar arrays would have resulted in felling / coppicing of trees primarily within the hedgerows and field margins within the Site.
- 3.2.2 Approximately 50% of the Site is now different from the site that was previously proposed (but not submitted through the DNS process). The changes to the Site boundary are summarised as follows:
- The total Site area has been reduced from 37.5ha to 35.53ha;
 - A field, furthest to the east has been removed from the proposed Site (the field is adjacent to woodland);
 - A field, furthest to the northwest has been removed from the proposed Site (this field is surrounded by Ancient Woodland); and
 - Additional fields have been added to the northwest and northeast of the Site.

- 3.2.3 More recently, the proposals have been further refined to provide finer detail revisions following site specific feedback and technical reports. For example, internal access tracks and fencing has been revised to avoid hedgerow and trees thereby enabling greater tree and hedgerow retention. Ecologically sensitive landscaping and planting is also proposed. Furthermore, the access arrangements have been reviewed to provide sufficient visibility whilst also retaining hedgerows and trees wherever possible.
- 3.2.4 Subsequently the layout was updated to avoid any perceived overlap with the Mona Offshore Wind project, which gained a Development Consent Order (DCO) after the St Asaph project was submitted for consideration through the DNS process. Specifically, the area of overlap related to ecological mitigation proposed in the Mona DCO. The St Asaph development boundary (red line) is unchanged, however, the layout has been updated to remove panels and development from a north western field which overlaps with the Mona DCO boundary. This reduced the extent of development within the red line boundary and removes development activity from the area which overlaps with the Mona DCO. The proposed changes do not introduce any new or materially different environmental effects, and indeed the removal of panels from this north western field reduces the overall extent of development. The remaining layout has been rationalised to retain the same power output.

3.3 Key aspects of the development

Layout

- 3.3.1 The location of the Development is shown on the Site Location Plan and the Site Layout Plan. The Site Layout Plan demonstrates the arrangement of the equipment, which has been carefully considered to ensure any potential significant effects are minimised. A number of inherent mitigation measures have been incorporated into the design, which are detailed below within section 5, this includes extensive landscaping and planting works alongside the main solar areas.

Solar Panels

- 3.3.2 The solar panels will be mounted on metal frames, secured to the ground by metal piles (piling depths typically between 1.5m and 2m), with the maximum height of the panels 3m above ground level. The panels will face due south and will be dark blue or black in appearance. The lowest edge of the panels will be a minimum of 90cm above the ground and they will be positioned in rows with approximately 4.5 metres of space from front to back, to ensure the land can remaining in agricultural use (grazing).

Security Fencing

- 3.3.3 The Development will be enclosed by a security fence, with a passive infra-red (PIR) system. CCTV options are shown in the proposed plans.

Waste

- 3.3.4 Once operational, the Development will not generate waste. During the construction period, measures will be in place to minimise waste and maximise opportunities for recycling, including through implementation of a CEMP. All relevant recycling and waste regulations and policy will be followed at all times, which will include the Waste Electrical and Electronic Equipment Directive.

Noise

- 3.3.5 The only noise generating equipment will be from the fans in the inverter cabinets. which are installed along each array.

On-site access tracks, entrances and exits

- 3.3.6 Internal access tracks made of crushed, permeable stone will be implemented across the Site. These are required to provide suitable access to the various areas of the site.

Electrical cabling

- 3.3.7 In order to connect the two parcels of land a connection cable will be installed below ground, with directional drilling in certain areas to avoid significant environmental effects.

- 3.3.8 The following components would form temporary features throughout the construction phase:

- Temporary enabling works and construction compound, and
- Hardstanding for lay down areas.

Temporary enabling works and construction compounds

- 3.3.9 Enabling works will be erected at the beginning of the construction period. Each temporary construction compound may contain temporary site offices, with ancillary services including sealed waste storage toilet facilities, sufficient parking for cars and construction vehicles, storage facilities and a receiving area for incoming vehicles.

Cable Route

- 3.3.10 The project will connect to the nearby St Asaph substation by way of an underground cable, which will run from the onsite DNO substation to the main St Asaph substation. The cable is proposed to be positioned within the public highway and to follow existing cable and utilities routes where feasible and where such routes exist. Taking this approach limits the amount of undeveloped land required for the cable route and means the route avoids key existing assets such as trees and hedgerows.

3.4 Flood Risk and Drainage

- 3.4.1 The Site falls entirely within the Development Advice Map (DAM) Flood Zone A and therefore has a low risk of flooding annually. The NRW 'Flood map for Planning' indicates that the Site is within an area at risk of flooding from Rivers of the Sea. The River Elwy is located to the east of the Site. The mapping also indicates that the Site could be susceptible to some surface water flooding.
- 3.4.2 The Development will introduce an area of impermeable surfacing over ground. Surface water runoff will be managed during the construction and operational phases through the provision of Sustainable Drainage Systems (SuDS). Sustainable drainage has been considered and further information can be found in the Flood Consequence Assessment and Surface Water Drainage Strategy which accompanies this application.

3.5 Transport and Access

- 3.5.1 Construction traffic will access the Site via the A525 south off the A55, following the A525 south until the roundabout with B5381; and following the B5381 south-west to Cefn Meririadog.
- 3.5.2 During construction, it is anticipated that there will be four-two-way HGV movements generated per day. This is likely to be higher for the initial two weeks of the set-up of the Development which may rise to eight two-way movements across the course of the day.

- 3.5.3 Once the Development is operational, it is expected that there will be one van accessing the Site twice per month. Further, access from Cefn Meiriadog will need widening to accommodate the movement of 16.5m large articulate lorries.
- 3.5.4 A Transport Assessment has been prepared and accompanies the submission.

3.6 Environmental Sustainability

- 3.6.1 The Development is static in nature and does not involve the use of any hazardous substances, and as such there are no immediate risks to public safety beyond the Site. Furthermore, a security system and security fencing will be installed as part of the Development.
- 3.6.2 The Proposed Development seeks to deliver a solar farm, which will enable a substantial amount of renewable energy to feed into the UK grid's network and will support maintaining security of supply. Furthermore, the operation of the Development will not present any risks in terms of hazardous materials, pollution, emissions or any other operational hazards.
- 3.6.3 The Development could also provide local educational opportunities, leading to a wider awareness of renewable energy and an increased interest in environmental issues.
- 3.6.4 There is a strong local, national and international policy steer towards delivering ambitious reductions in carbon emissions through the growth of renewable energy generation. Given the intended generating capacity over 18MW, the Development would make a substantial contribution towards these targets.
- 3.6.5 It is therefore clear that there are significant and clear environmental benefits associated with the Development.

3.7 Construction Methodology

- 3.7.1 The construction period for the Development is expected to take approximately 36 weeks. The main construction activities will be based on a typical six day working week (07:00 to 19:00 Monday to Friday and 07:00 to 17:00 hours on Saturdays) dependant on weather conditions.
- 3.7.2 Once construction work has commenced, wheel washing facilities for vehicles leaving the Site will be utilised. The responsibility of establishing whether a vehicle requires wheel washing, prior to leaving the Site, would be taken by senior contractors. All vehicles would be inspected for cleanliness upon departure from the Site.

4 Pre-application engagement

4.1 Overview

- 4.1.1 This section demonstrates how the Applicant has consulted with the local community and key stakeholders regarding the Development and outlines how input from DCC, local councillors and stakeholders has been sought prior to the submission of the application.
- 4.1.2 The Applicant understands the importance of engaging with as many stakeholders as possible throughout the pre-application stage and to date. There has been extensive pre-application on the project which can be broadly summarised as:
- i. Initial pre-application discussions with Denbighshire County Council in March 2022.
 - ii. Revisions to the proposals in 2023 and 2024 following advice received and changes to the site.
 - iii. Further pre-application discussions with Denbighshire County Council in December 2024.
 - iv. Informal updates and engagement with local stakeholders in early 2025.
 - v. Statutory PAC in May 2025, including local consultation events and engagement.
 - vi. EIA Screening used to inform the site layout and mitigation.
- 4.1.3 A full account of the consultation undertaken is provided in the Pre-Application Consultation (PAC) Report, prepared by Thirty4/7, which summarises the statutory consultation process undertaken by the Applicant in accordance with the requirements as set out within the Regulations.

4.2 Initial Pre-Application engagement

- 4.2.1 As part of the design process, pre-application consultation was undertaken with DCC in the first instance. The main purpose of this consultation was to establish common ground on the principal issues that would need to be addressed and the scope of documents that would need to be included.
- 4.2.2 A pre-application request was submitted to DCC on the 18th March 2022 with pre-application advice issued on the 5th May 2022. An overall assessment of the Development based on the information submitted as part of the pre-application enquiry was provided and is summarised below:
- **Principle of Development:** Future Wales (National Development Framework (NDF) – 2040) sets out strong policy support (Policy 17 and 18) for developing renewable and low carbon energy schemes, subject to compliance with the policy criteria. Further, Planning Policy Wales (Edition 11) addresses the Welsh Government's support for renewable energy. Policy VOE 10 of the LDP is supportive of renewable energy proposals, where they are located to minimise visual, noise and amenity impact and demonstrate no unacceptable impact upon the interests of nature conservation, wildlife, natural and cultural heritage, landscape, public health and residential amenity. Furthermore, DCC highlighted that their adopted Renewable Energy SPG provides further guidance on solar energy development;
 - **Material Planning Considerations:**
 - **Best and Most Versatile Agricultural Land:** DCC stated that should the ALC survey find that the Site does include BMV land, then the loss of BMV land would need to be fully justified

which should include a comprehensive sequential site assessment to demonstrate compliance with PPW;

- **Landscape Character and Visual Amenity:** DCC highlighted that the key planning consideration is likely to be the landscape and visual impacts of the Development. Additionally, whilst the Development is likely to be a visible feature from higher ground within the AONB to the east, the potential impact on key outward views from within the AONB and the setting of the AONB would need to be carefully considered. As a part of the application, a LVIA would be carried out. Furthermore, the LVIA will also include a cumulative assessment to assess the impact of the Development in combination with existing and proposed renewable energy developments, electrical / energy infrastructure developments and major developments in the vicinity of the Site;
- **Trees and Landscaping:** DCC highlighted that there are trees around the Site which may be impacted by the Development. As such, the application will be accompanied by a comprehensive landscaping masterplan which identifies sites for planting to assist with screening the Site and/or improve the quality of the landscape as mitigation for the Development's impact;
- **Other Visual Amenity Considerations:** DCC highlighted that operational lighting is not referenced. The application will be accompanied by a lighting assessment and lighting plan to ensure that any operational external lighting is designed and managed to minimise any impacts on visual amenity of the local area and nocturnal wildlife in the vicinity of the Site;
- **Cumulative Effects:** DCC highlighted that the area hosts a number of wind energy developments of varying scales. As such, the application will be accompanied by an assessment of the cumulative effects of the Development in combination with other renewable energy and energy infrastructure developments;
- **Ecology / Biodiversity:** DCC highlighted that any additional ecological survey work recommended by the preliminary ecological appraisals should be undertaken. Furthermore, the Council highlighted that the wider area is home to the nationally important great crested newt (GCN). As such, dependent on the results of surveys, mitigation will be outlined to ensure that the Development maintains / restores favourable conservation status. Furthermore, if the Development determines that GCN will be disturbed, the Development will include the provision of compensatory land and/or the provision of a commuted sum and an index linked payment. Furthermore, the Development will provide net biodiversity gain and enhancement measures;
- **Historic Environment:** DCC highlighted that there are a number of heritage assets within a 5km radius of the Development including listed buildings, scheduled ancient monuments and Historic Parks and Gardens. Furthermore, DCC highlighted that the Site is also undeveloped greenfield land and there may be sub-surface archaeological remains. As such, the application will be accompanied by a Heritage Assessment (including geophysical survey), where harm is identified to the setting of heritage assets or to archaeological features which may be present on the Site. Mitigation / compensation measures will also be provided where necessary;
- **Water / Drainage / Flood Risk:** DCC highlighted that flood risk is a material consideration in planning. As such, the application will be accompanied by a surface water drainage strategy and any SuDS proposals will be shown on plans including with the Development
- **Access / Highways / Parking:** DCC highlighted that having regard to the scale of the Development:

- A Transport Assessment rather than a Transport Statement should be undertaken;
 - Detailed design of any new means of permanent or temporary access to the Site should be provided;
 - A detailed Construction Traffic Management Plan (CTMP) should be provided; and
 - Details of operational traffic movements and onsite parking and turning facilities should be provided.
- **Public Rights of Way (PRoW):** DDC highlighted that in respect of PRoW, it is not clear from the proposed layout plan whether or not the Development or construction phase would impact upon or interrupt the PRoW on Site. DCC highlighted that the PRoW must not be disrupted during the construction of operational phase;
 - **Residential and Public Amenity:** DCC highlighted that whilst the Site is located in open countryside, there are a number of individual residential properties within close proximity. As such, the application will be accompanied by an assessment to demonstrate that the Development would not adversely impact on the residential amenity of neighbouring properties. Furthermore, DCC considers a noise assessment is required to ensure the amenity of neighbouring properties is not affected.

4.2.3 In respect of the principle of the Development, DCC states that the proposal would bring strategic benefits in terms of increased renewable energy generation, contribute to the de-carbonisation of the energy supply network and towards combating the climate emergency. As such, DCC confirm that the principle of a solar energy farm park of the scale proposed, is considered to be in general accord with national and local planning policies.

4.3 Updated pre-application engagement

4.3.1 Following amendments to the red line boundary in 2024, a further pre-application submission was made to DCC on the 20th December 2024. The primary purpose of the changes to the Site have been to remove land which due to shading issues, placing solar arrays would have entailed some cropping / coppicing of mature trees primarily within the hedgerows and field margins within the Site.

4.3.2 Approximately 50% of the Site is now different from the site that was previously considered by the Council. The changes to the Site boundary are summarised as follows:

- Total Site area has been reduced from 37.5ha to 33.54ha;
- A field, previously furthest to the east has been removed from the proposed Site (the field is adjacent to woodland);
- A field, previously furthest to the northwest has been removed from the proposed Site (this field is surrounded by Ancient Woodland);
- Additional fields have been added to the northwest of the Site; and
- Additional fields have been added to the northeast of the Site.

4.3.3 A pre-app response was received from DCC on the 25th February 2025 which concluded “*the principal of a solar park of the scale proposed is supported by national and local planning policy, subject to the assessment of site-specific impacts. However, the site is located in an open countryside location and*

may give rise to impacts on a range of planning considerations...and therefore comprehensive assessments are required to be carried out and the final design and layout of the proposal needs to be sensitive to its setting to ensure it does not give rise to any unacceptable impacts”.

4.3.4 The project has been reviewed and refined following this advice, as detailed in section 3 of this report.

4.4 PAC Stage consultation

4.4.1 The project has been subject to Statutory Pre-application Consultation, as required by the Town & Country Planning Act 1990, with PAC stage consultation undertaken for the requisite period from 1st May 2025 to 12th June 2025. Full details of the PAC are set out in the submitted PAC report. Relevant and interested parties, including specialist consultees, were identified and consulted accordingly

4.4.2 Further non-statutory consultation and engagement was employed to ensure that the local community and interested parties had the opportunity to find out about and contribute to the consultation. Further consultation was undertaken in April and May 2026 regarding further amendments related to the adjacent Mona DCO project.

4.4.3 A full summary of this non-statutory consultation is set out in the submitted PAC Report.

Community consultation

4.4.4 The statutory consultation as part of the DNS regime also included specific community consultation which included:

- Writing to neighbours and other interested parties nearby.
- A leaflet delivered to local addresses in the areas in and around St Asaph.
- Press, site and other notices, as required by the Regulations.
- Public consultation event held on 22nd May 2025.

4.4.5 The leaflet and letters contained information about the proposals, the forthcoming consultation events, and how to find out further information. Alongside the leaflet, the Applicant published a consultation website which contained additional information about the proposals, the planning and DNS process, the technical work completed to date and the consultation strategy. The project website also contained the full pack of draft DNS submission documents, as required by the Regulations and Acts, along with information from the consultation event.

4.4.6 The Applicant met with local residents on 22nd May 2025 to discuss the proposals and at the same time invited comments directly and through the website. Comments raised were responded to by the project team during the consultation process with additional information provided where appropriate. Feedback at the consultation event and via feedback forms covered the following broad topics:

- Principle of development.
- Use of agricultural land over brownfield land and vacant roof space on buildings.
- Effects on the landscape and visual impact, including views from properties nearby.
- Cumulative local effect of renewable energy projects and infrastructure, particularly landscape changes and loss of greenfields.

- Issues relating to ecology and wildlife.
- Traffic and transport, and particularly access routes to the site from Glascoed Road.
- Loss of agricultural land.
- Flood risk and drainage concerns.

- 4.4.7 Following this process a further targeted consultation related to minor amendments to the proposed development to remove areas of development which overlapped with the Mona DCO project was undertaken in April and May 2026.
- 4.4.8 Feedback from the consultation process is set out in the PAC Report. And, where possible, feedback received during the informal consultation has been fed into the design of the Site and assisted with the evolution of the project or technical reports.

4.5 EIA Screening

- 4.5.1 An Environmental Impact Assessment (EIA) Screening Request was submitted to PEDW on the 13th May 2022 under regulation 31(1) of Town Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. The Request sought a decision from Welsh Ministers to make a Screening Direction to whether the Development is considered to be EIA Development. On the 26th January 2023, PEDW confirmed the Development at that time was not EIA Development, stating:

'The proposed development is the installation of a solar farm on land approximately 1 km southwest of St. Asaph, Denbighshire. The solar farm will be connected to a substation by underground cables laid to the St. Asaph grid. The proposal is sufficiently distanced from historic assets, and coupled with inclusion of mitigation measures in the CEMP, any impact on adjoining land and the majority of ecological features can be appropriately mitigated and minimised. Whilst there are likely to be cumulative Landscape and Visual Impacts with other proposed infrastructure projects in the vicinity, I do not consider that they are likely to be significant.'

- 4.5.2 Rescreening of the Proposed Development was required as a result of the changes to the red line boundary as discussed above. A rescreening letter was prepared and subsequently submitted to PEDW on the 19 December 2024. A response was received on the 21 February 2025. This concluded that the Development is deemed EIA development within the meaning of the Regulations. The assessment concluded that

'The proposed solar farm will lead to effects on a number of aspects of the environment. However, due to the nature of the Proposed Development, most effects are unlikely to be significant. In terms of biodiversity, Great Crested Newts (GCN) have been confirmed within the Site. NRW are satisfied with the proposed mitigation measures and habitat enhancement, and therefore impacts on GCN and other species would not be significant.'

On the basis of the information available in the Screening Report and the consultation responses that DCC and NRW, I consider that significant effects are likely in relation to landscape character and visual amenity, particularly on the Clwydian Range and Dee Valley Area of Outstanding natural Beauty / National Landscape. In addition, due to the concentration of renewable energy infrastructure within the immediate area, significant cumulative landscape and visual effects are also considered likely. As such, the Proposed Development represents EIA development, and an ES is required to accompany any future DNS application.

- 4.5.3 Consequently, this application is therefore accompanied by an Environmental Statement.

5 Planning Policy Framework

5.1 Overview

- 5.1.1 The following sections provide a review of the relevant policy context for the Development. As noted in Section 1, this PDAS states that the Development will have a generating capacity of up to 19MW, meaning it will be classified as a DNS under Section 4(1) of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 (as amended), for the purposes of the s62(D) of the Planning (Wales) Act 2015.
- 5.1.2 This section presents key policy, legislation and guidance relevant to the Development, including energy and climate change policy and planning policy at the national and local level.

5.2 National Policy on Climate Change, Sustainability and Renewable Energy

- 5.2.1 It is accepted that greenhouse gas emissions need to be significantly reduced and in 2005, the Kyoto Protocol came into effect providing the first ever framework for international action. Under the Protocol, the United Kingdom, together with 37 other industrialised countries (called '*Annex I Countries*'), committed themselves to reducing greenhouse gas emissions by 5.2% from 1990 levels by 2012.
- 5.2.2 The Committee on Climate Change (CCC) published a report in May 2019, titled '*Net Zero – The UK's contribution to stopping global warming*'. The report responded to a request from the Government to reassess the UK's long-term emissions targets and recommended a new emissions target for the UK: net zero greenhouse gases by 2050.
- 5.2.3 Chapter 6 of CCC's report refers to delivering a net zero emissions target for the UK. The chapter sets out a number of actions, including the transition to a net zero emissions economy and what is needed to underpin delivery of net zero emissions in the UK. 'Part b' sets out key near term actions to put the UK on track on net – zero greenhouse gases emissions by 2050 and recommends that more rapid electrification must be accompanied with greater build rates of low carbon generation capacity, accompanied by measures to enhance the flexibility of the electricity system to accommodate high proportions of inflexible generation. In addition, the report presents that Development of new infrastructure will be important in opening new avenues for decarbonisation.
- 5.2.4 Evidence for the third UK Climate Risk Independent Assessment (CCRA3) in relation to Wales, highlights that the climate in Wales is already changing, with an increase of 0.9°C in the average annual temperature since the mid-1970s, an increase of 2.0% in annual mean rainfall and 6.1% in sunshine hours during the same period, approximately 1.4mm of sea level rise per year since 1901, and an increase in extreme heat events.
- 5.2.5 In June 2019, the UK government declared a climate emergency following the publication of the CCC report. The resultant legislation amended the Climate Change Act 2008 (c.27) and introduced a legally binding target to achieve 'net zero' by 2050. Paragraph 1 of the Climate Change Act (as amended) sets out the target to 2050 and states that:

'it is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (which means the aggregate amount of net UK emissions of carbon dioxide for that year and net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas)'.

- 5.2.6 On 20 April 2021, the UK Government announced its commitment to reduce carbon emissions by 78% by 2035 compared to 1990 levels (including, for the first time, those from shipping and aviation). The new target became enshrined in law in June 2021.
- 5.2.7 The latest update report by the CCC was published in June 2022 which set out a number of key messages, including that tangible progress is lagging behind policy ambition. The report states that with an emissions path set for the UK and the Net Zero Strategy published, greater emphasis and focus must be placed on delivery.

Welsh Government Climate Emergency

- 5.2.8 In April 2019, the Welsh Government declared a climate emergency and in June 2019 accepted the CCC's recommendation for a new emissions target but set a more ambitious target of net zero emissions no later than 2050.
- 5.2.9 In March 2021, new legislation came into force in Wales, amending the 2050 emissions target¹ and the interim emissions targets². As well as amending the 2050 emissions target to net zero, the 2030 target was increased from 45% to 63% below the 1990 baseline, and the 2040 target was increased from 67% to 89% below the 1990 baseline.
- 5.2.10 Evidence for the third UK Climate Risk Independent Assessment (CCRA) in relation to Wales³, highlights that the climate in Wales is already changing, with an increase of 0.9°C in the average annual temperature since the mid-1970s; an increase of 2% in annual mean rainfall and 6.1% in sunshine hours during the same period; approximately 1.4mm of sea level rise per year since 1901; and an increase in extreme heat events.
- 5.2.11 The Environment (Wales) Act 2016 outlines the legal obligation behind the net zero targets in Wales. Specifically, Section 29 'The 2050 emissions target' legally binds Wales to achieving at least 100% zero carbon system by 2050.

Prosperity for All: A Low Carbon Wales (March 2019) and Net Zero Wales Carbon Budget 2 (October 2021)

- 5.2.12 The Environment (Wales) Act 2016 requires Welsh Government to reduce emissions of greenhouse gases (GHGs) in Wales by at least 80% for the year 2050. Under s39 of that Act, Welsh Ministers must prepare and publish a report for each budgetary period setting out their policies and proposals for meeting the carbon budget for that period.
- 5.2.13 Prosperity for All: A Low Carbon Wales is the Welsh Government's first statutory decarbonisation plan. It sets out the Welsh government's approach to cut emissions and increase efficiency in a way that maximises wider benefits for Wales, ensuring a fairer and healthier society. It sets out a hundred policies and proposals that directly reduce emissions and support the growth of the low carbon economy.
- 5.2.14 It specifically seeks to reduce the use of fossil fuels for power generation, and promote and accelerate the deployment of renewable energy generation. The plan also recognises that energy storage and flexibility services will need to be provided to integrate with new renewable energy development as part of a whole system approach. In relation to the power sector, the plan sets a target to reduce power sector emissions by 37% from baseline levels [1990s] by the year 2030. The Welsh

¹ The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021

² The Climate Change (Interim Emissions Targets) (Wales) (Amendment) Regulations 2021

³ www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA-Evidence-Report-Wales-Summary-Final.pdf

Government's Sector Emission Pathway for Power, published in June 2019, states that power sector emissions would be 2% greater than the baseline level in the year 2020, meaning that there are substantial emission reductions needing to be delivered in the sector by 2030.

5.2.15 Policy 26 (Implementing Energy Consenting, Planning & Permitting policy) identifies planning as a key lever in Wales for determining the sources of fuel for power generation. The NDF is identified as a key aspect of this as it will play:

- A key role in facilitating clean growth and decarbonisation, and helps build resilience to the impacts of climate change. Achieving our strategic decarbonisation goals is highlighted as a key driver, which all development plans must support.

5.2.16 Policy 31 (Delivery of our Renewable Energy Targets) specifically seeks to deliver the 2017 Renewable Energy Targets announced by the Welsh Government, including generating 70% of Wales' electricity consumption from renewables by 2030.

5.2.17 The Welsh Government published its second statutory decarbonisation plan (Net Zero Wales Carbon Budget 2) in October 2021. This sets out the policies and approach it intends to take to meet Wales' second Carbon Budget (2021-25).

5.2.18 In respect of energy generation, Net Zero Wales sets the following ambitions:

- By 2025, 1GW additional renewable energy capacity will be installed; and
- From 2021 there will be no new build unabated fossil fuel generation in Wales. All current unabated gas generation removed from the system by 2035.

5.2.19 The Plan recognises the need to maintain a secure supply of electricity for people and businesses in Wales and seeks to meet this through decarbonised sources as soon as possible and from 2035 at the latest. The transition to a low carbon heating system is identified as one priority area that will require a significant increase in renewable energy generating capacity. Two areas of action are identified for the electricity and heat emissions sector to meet Carbon Budget 2:

- Decarbonising electricity production from fossil fuels; and
- Increasing electricity from low carbon and variable renewables.

5.2.20 Net Zero Wales' Policy 22 seeks to increase the delivery of renewable energy developments on land through the planning system. It recognises that Future Wales provides a positive policy framework for the consenting and development of large-scale renewable energy projects and associated infrastructure. The plan also confirms that the current renewable energy target of the equivalent of 70% of electricity consumption in Wales to come from renewable sources by 2030 will be reviewed in 2022.

National Infrastructure Strategy – Fairer, Faster and Greener (November 2020)

5.2.21 The Strategy sets out the UK Government's plans to deliver on its ambition, to 'deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country, strengthen the Union, and put the UK on the path to net zero emissions by 2050'. It states that:

'to achieve net zero by 2050, the power system will need to be virtually carbon free and significantly larger to cope with the additional demand from electrification in transport, heating and some industrial processes. It states this expanded system requires increased investments in network infrastructure, sources of flexibility, such as

interconnection, demand response and storage, together with enough low carbon generation capacity to provide the vast majority of the UK's electricity needs'.

- 5.2.22 It states that net zero requires a dramatic increase in the share of generation from renewables, including specifically from onshore wind and solar. The Government also proposes to continue supporting the roll out of renewables through the Contracts for Difference subsidy mechanisms, which now includes solar and onshore wind technologies.

Review of Wales' Energy Targets (January 2023)

- 5.2.23 In January 2023, the Welsh Government announced a proposal to alter renewable energy targets. A consultation was thus launched on 24th January 2023 to 18th April 2023, seeking views on revising the current targets listed below:

- Wales to generate electricity equal to 70% of its consumption from renewable sources by 2030;
- 1GW of renewable energy capacity in Wales to be locally owned by 2030;
- An expectation for all new energy developments in Wales to have at least an element of local ownership from 2020.

- 5.2.24 A summary of consultation information was then produced, which will be used to finalise the new renewable energy target for Wales. The Welsh Government collected feedback on local ownership, pace of energy consumption after 2035, heat pumps and employment in the energy sector. This feedback will be used to progress any new targets and will be reported on in the Energy Generation in Wales annual reports.

The Well-being of Future Generations (Wales) Act 2015 (April 2015)

- 5.2.25 The Well-being of Future Generations (Wales) Act 2015 (herein after referred to as the Well-Being Act 2015) is a key piece of legislation for Wales which seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act encourages public bodies, including Natural Resources Wales and Local Authorities, to work together and with the wider community to think long term, creating a Wales '*that we all want to live in, now and in the future*'.
- 5.2.26 The Well-Being Act 2015 sets out seven '*well-being goals*', which provide a shared vision for all public bodies to work towards. The seven goals are listed below:
- A prosperous Wales;
 - A resilient Wales;
 - A healthier Wales;
 - A more equal Wales;
 - A Wales of cohesive communities;
 - A Wales of vibrant culture and thriving Welsh language, and
 - A globally responsive Wales.

5.2.27 Coupled with the well-being goals set out above, is the ‘Sustainable Development Principle’, which means that any public body in Wales *‘must act in a manner which seeks to ensure that the needs of the present are met without comprising the ability of future generations to meet their own needs’* (Paragraph 5(1) of the Well – Being Act 2015). The five aspects that collectively make up the Sustainable Development Principle are:

- A long-term thinking;
- Prevention;
- Integration;
- Collaboration; and
- Involvement.

5.2.28 Although NSIPs are not bound by the Well Being Act (a fact recognised by the Welsh Government (WG) at the Wylfa Newydd DCO Examination), the Welsh Government may try and secure appropriate mitigation to ensure these goals are met (this is a position it is increasingly taking at DCO Examinations).

Prosperity for All: Economic Action Plan (December 2017)

5.2.29 There is widespread Welsh Government support for the transition to a low carbon and prosperous society. This includes a number of documents which sit outside the planning policy landscape – the Welsh Government’s Prosperity for All: Economic Action Plan (December 2017) states:

‘the shift towards a low – carbon future offers huge opportunities for our economy to diversify and grow – but it also challenges us to support business, people and places in transitioning toward that low carbon future’.

The Ten Point Plan for a Green Industrial Revolution (November 2020)

5.2.30 The Ten Point Plan for a Green Industrial Revolution was published in November 2020 and seeks to develop a green recovery – with high-skilled, high-paid jobs that help make the UK cleaner and greener. The Ten Point Plan will mobilise £12 billion of Government investment and potentially three times as much from the private sector, to create and support up to 250,000 green jobs.

5.2.31 The plan seeks to turn the UK into the world’s number one centre for green technology and finance, laying the foundations for decades of economic growth by delivering net zero emissions in a way that creates jobs. The plan demonstrates the UK’s significant and continuing commitment to tackling greenhouse gas emissions.

Net Zero Strategy: Build Back Greener (October 2021)

5.2.32 First published in October 2021 by the Department for Business, Energy and Industrial Strategy, the net zero strategy sets out policies and proposals which ensure the UK is in accordance with upcoming carbon budgets and Nationally Determined Contributions (NDC). NDCs provide a mechanism for countries to voluntarily impose national emission limits under the Paris Agreement. The strategy seeks to realise a decarbonised economy by 2050.

British Energy Security Strategy (April 2022)

- 5.2.33 The British Energy Security Strategy was published in April 2022 by the UK government. The strategy highlights that energy is the lifeblood of the global economy and everything that we do depends on a reliable flow of affordable energy. The strategy is focused on improving energy efficiency and reducing the amount of energy that households and businesses need and increasing domestic supply, primarily through more renewable supplies and nuclear power plants.
- 5.2.34 The strategy highlights the importance of building a British energy system that is self-sufficient and not dependent on volatile fossil fuel markets. The strategy outlines that investing in the North Sea, expanding renewable capacity and leading in nuclear power will also enable the UK to produce more hydrogen. These steps combined, will accelerate progress towards net zero, which is fundamental to energy security. The strategy states that by 2030, 95% of British electricity could be low-carbon and by 2035, the electricity system will be decarbonised. This transition will reduce dependence on imported oil and gas and will deliver a radical long-term shift in energy with cleaner, cheaper power, lower energy bills and create thousands of high wage, high skilled new jobs.
- 5.2.35 More specifically in respect of renewable energy, the strategy highlights that accelerating the transition from fossil fuels depends on how quickly renewables can be rolled out. Furthermore, the strategy outlines an ambition of developing appropriate policy to enable investment in long-duration energy storage. The plan's stated aim is for a '*green industrial revolution*', which has put the UK at the forefront of many renewable technologies, delivering £40 billion of private investment.

National Planning Legislation for Energy

- 5.2.36 Following on from the publication of CCC's report in May 2019, the United Kingdom (UK) became the first country to declare a climate emergency and legislate long term climate targets. The resultant legislation amended the Climate Change Act 2008 (c.27) and introduced a legally binding target to achieve 'net zero' by 2050. Paragraph 1 of the Climate Change Act (as amended) sets out the target to 2050 and states that '*it is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline (which means the aggregate amount of net UK emissions of carbon dioxide for that year and net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas)*'.

Clean Power 2030 Action Plan

- 5.2.37 In response to the clear and established need for the deployment of significant amounts of clean and renewable energy the Government commissioned a wholesale review of the grid connections process and UK-wide needs.
- 5.2.38 The most recent publication, the Clean Power Action Plan 2030 published in December 2024 and updated in April 2025, reiterates this need for a rapid deployment of new clean energy. It sets an ambitious target of 45-47GW of solar power to be achieved by 2030. To achieve these targets, it is clear that considerable growth in large scale solar farms will be necessary and this cannot be achieved solely by the use of brownfield land or roof top installations.

5.3 Planning Policy Framework

- 5.3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 Act, this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Under Section 38(4) of the Act the Development Plan in Wales comprises the following:

5.3.2 The National Development Framework for Wales:

- The National Development Framework for Wales;
- The Strategic Development Plan (SDP) for any strategic planning area that includes all or part of that area; and
- The Local Development Plan (LDP) for that area

5.3.3 The following section provides an overview of the planning policy relevant to the Development.

5.4 Relevant National Planning Policy

Future Wales: The National Plan 2040 (February 2021)

5.4.1 Future Wales is the Welsh Government's National Development Framework and is the highest tier of the Development Plan in Wales. It sets out a strategy for addressing key national priorities through the planning system, which include achieving decarbonisation, climate-resilience and achieving net zero. It refers to climate change, with projections showing an increased chance of milder, wetter winters and hotter, drier summers, rising sea levels and an increase in the frequency and intensity of extreme weather events.

5.4.2 Futures Wales makes explicit reference to the benefits of renewable energy, stating:

'It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.'

5.4.3 Future Wales sets the following targets for the generation of renewable energy:

- For 70% of electricity consumption to be generated from renewable energy by 2030;
- For one gigawatt of renewable energy capacity to be locally owned by 2030; and
- For new renewable energy projects to have at least an element of local ownership from 2020.

5.4.4 Section 3 includes the Future Wales' Outcomes which are described as '*collectively a statement of where we want to be in 20 years' time. Every part of Future Wales...is concerned with achieving the Outcomes*'. The Outcome of principal relevance to the Development is:

'A Wales where people live in places which are decarbonised and climate resilient: The challenges of the climate emergency demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society'.

5.4.5 Policy 17 states that the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet future energy needs and to combat the climate emergency. Applicants are required to demonstrate the net benefits a scheme will bring in terms of social, economic, environmental and cultural improvements to local communities and that the visual impact of new grid infrastructure needs to be minimised.

5.4.6 Policy 18 provides the criteria for assessing large scale proposals for renewable and low carbon energy and is required to be read together with Policy 17. It states that:

Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:

- vii. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);*
- viii. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;*
- ix. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);*
- x. there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;*
- xi. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;*
- xii. there are no unacceptable adverse impacts on statutorily protected built heritage assets;*
- xiii. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;*
- xiv. there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA7T);*
- xv. there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;*
- xvi. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;*
- xvii. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.*
- xviii. The cumulative impacts of exiting and consented renewable energy schemes should also be considered.*

- 5.4.7 The supporting text to both policies, highlights that Policy 17 demonstrates the Welsh Government's support in principle for all renewable energy projects and technologies. The supporting text to Policies 17 and 18 also refers to the Welsh Government's target for new renewable energy projects to have at least an element of local ownership from 2020, but specifically states that this is not a planning consideration.
- 5.4.8 Future Wales states that Wales is abundant in opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential. Generating renewable energy is a key part of decarbonisation and tackling the climate emergency. Furthermore, the strategy highlights the need to consider large-scale energy storage as part of the energy system to provide grid balancing.
- 5.4.9 From a regional perspective, Policy 24 highlights that the Welsh Government supports north-west Wales as a location for new energy development and investment. The policy also states that new energy-related development in the region should support local and regional communities; provide jobs in investment, training and skills and work with universities and businesses across the region and the north-west of England to co-ordinate and maximise new investment to support the wider region.
- 5.4.10 PPW is supplemented by Technical Advice Notes (TAN) which provide additional detail on a variety of topics. Of particular reference to this Development are:
- TAN 5: Nature Conservation and Planning (September (2009);
 - TAN6: Planning for Sustainable Rural Communities (July 2010);
 - TAN 12: Design (March 2016);
 - TAN 15: Development and Flood Risk (July 2004);
 - TAN 18: Transport (March 20007); and
 - TAN 24: The Historic Environment (May 2017)

Overarching National Policy Statement for Energy (NPS EN-1) (July 2011)

- 5.4.11 This sets out the UK Government's commitment to increasing renewable generation capacity. Paragraph 1.2.1 states that:

"In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)".

- 5.4.12 As this application falls within the definition of a 'Development of National Significance' (DNS), it falls under s62(D) of the TCPA, as amended by The Planning Wales Act.
- 5.4.13 Paragraph 2.2.6 of EN-1 states that '*the UK needs to wean itself off such a high carbon energy mix: to reduce greenhouse gas emissions, and to improve the security, availability and affordability of energy through diversification*'. Other relevant extracts from the NPS include:

"The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. (Paragraph 3.1.1)

As part of the UK 's need to diversify and decarbonise electricity generation, the Government is committed to increasing dramatically the amount of renewable generation capacity. (Paragraph 3.3.10)"

National Policy Statement for Renewable Energy Infrastructure (NPS EN – 3) (January 2024)

- 5.4.14 NPS EN-3 is a technology specific NPS regarding renewable electricity generation (both onshore and offshore). Paragraph 1.1.2 states that:
- 5.4.15 *'Electricity generation from renewable sources of energy is an important element in the Government's development of a low-carbon economy. There are ambitious renewable energy targets in place and a significant increase in generation from large-scale renewable energy infrastructure is necessary to meet the 15% renewable energy target'*
- 5.4.16 The EN-3 further describes essential renewable sources by stating 'solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation' in paragraph 2.10.13. Paragraph 2.10.10 notes a goal of 70 gigawatts in combined ground and rooftop solar developments by 2035.
- 5.4.17 The key factors influencing site selection and design (paragraph 2.10.18 to paragraph 2.10.48) are noted below:
- Irradiance and site topography;
 - Network connection;
 - Proximity of a site to dwellings;
 - Agriculture land classification and land type;
 - Accessibility;
 - Public rights of ways; and
 - Security and lighting.
- 5.4.18 Technical considerations for solar farms (paragraph 2.10.49 to paragraph 2.10.69) are listed as:
- Capacity of a site;
 - Site layout design and appearance;
 - Decommissioning; and
 - Flexibility in the project details.
- 5.4.19 Impacts to be considered from a solar development (paragraph 2.10.73 to paragraph 2.11.44) include:
- Biodiversity, ecological, geological conservation and water management;
 - Landscape, visual and residential amenity;
 - Glint and glare;

- Cultural heritage; and
- Construction including traffic and transport noise and vibration.

5.4.20 The factors that influence site selection and technical considerations noted in the EN-3 will be addressed.

Planning Policy Wales (Edition 12) (February 2024)

5.4.21 Planning Policy Wales (PPW) edition 12 was published in February 2024 and sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. PPW highlights that a well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

5.4.22 Its key principles are:

- Growing our economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating & sustaining communities; and
- Maximising environmental protection and limiting environmental impact.

5.4.23 Paragraph 2.14 states that the document acts as a catalyst for the positive delivery of the planning system across Wales.

5.4.24 Paragraph 2.26 explains the need for planning authorities to take a balanced approach to implement the Well-being of Future Generations Act and its Sustainable Development Principle. It states there may be occasions when one benefit of a development proposal outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals. It identifies a long list of key factors to consider in the assessment process. In summary these include:

- How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales;
- Whether environmental risks are prevented or appropriately managed;
- Whether the causes and impacts of climate change are fully considered through location, design, build, operation, decommissioning and restoration; and
- Whether a proposal supports decarbonisation and the transition to a low carbon economy.

5.4.25 Paragraph 3.30 states that the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources. It also states that the transition to a low carbon economy brings opportunities for clean growth and quality jobs, together with wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes. Paragraph 3.33 explains that the planning system plays a significant role in managing the significant risk of climate change to people, property, infrastructure and natural resources.

5.4.26 Section 5 of the PPW explains that the use of renewable and low carbon energy sources is one of the ways of achieving productive and enterprising places. Paragraph 5.7.1 sets out that low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power. This section further emphasises that the future energy supply mix will depend on a range of established and emerging low carbon technologies.

5.4.27 Paragraph 5.7.2 states that with the overall power demand expected to increase, significant investment into energy generation, transmission and distribution infrastructure will be needed to meet future demand. Ways to meet this demand include integrating renewable generation with storage, as well as other flexibility services.

5.4.28 Paragraph 5.7.6 states that the planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. Paragraph 5.7.7 presents that the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change. The planning system should:

- Integrate development with the provision of additional electricity grid network infrastructure;
- Optimise energy storage;
- Facilitate the integration of sustainable building design principles in new development;
- Optimise the location of new developments to allow for efficient use of resources;
- Maximise renewable and low carbon energy generation;
- Maximise the carbon impact of other energy generation; and
- Move away from the extraction of energy minerals, the burning of which is carbon intensive.

5.4.29 In relation to the rural economy, PPW specifically acknowledges that diversification of farms can include solar development. PPW paragraph 5.6.10 and 5.6.13 state that:

“...planning authorities should adopt a positive approach to diversification projects in rural areas... Diversification can strengthen the rural economy and bring additional employment and prosperity for communities.

Diversification can also include renewable energy proposals such as anaerobic digestion facilities of solar and wind installations, which will help to increase the viability of rural enterprises by reducing their operating costs. These schemes should be supported where there is no detrimental impact on the environment and local amenity.”

5.4.30 Paragraph 5.9.15 states that the energy generation is of national significance. Therefore, planning applications should be determined based on individual proposals and that the local need for a particular scheme should not be a material consideration.

Technical Advice Notes

5.4.31 A series of Technical Advice Notes (TANs) supplement PPW. However, these do not directly address renewable energy development and only provide technical guidance to more permanent developments.

Overarching National Policy Statement for Energy (NPS EN-1) (January 2024)x

- 5.4.32 Designated in January 2024, the National Policy Statement (NPS) sets out national policy for energy infrastructure and are material considerations in respect of the Development. Although the NPS are material considerations, they have been given minimal reference in Welsh Ministers decision letters for DNS solar farm applications.
- 5.4.33 The Overarching NPS (EN-1) sets out the background context, scope and geographical coverage of the 4 parts of the NPS.
- 5.4.34 Paragraph 2.2.1 of the states that the UK legislated for a 2050 net zero greenhouse gas emissions target through the Climate Change Act 2008 Order 2019. However, in 2020, the UK communicated in 2020 to reduce greenhouse gas emissions by 68% from 1990 levels by 2030. In April 2021, the government legislated the sixth carbon budget which requires the UK to reduce greenhouse gas from 1990 levels by 78% by 2035. Paragraph 2.2.2 explains that the UK government will continue to update this decarbonisation plan in the coming years.
- 5.4.35 To meet the noted net zero targets, EN-1 sets out goals for decarbonising the power sector, enabling security of energy supplies, and enforcing sustainable development. Paragraph 2.3.3 states that our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050. EN-1 clearly states the need for new energy infrastructure to increase the supply of clean energy from renewables, nuclear and hydrogen manufactured, as well as developing carbon capture and storage.
- 5.4.36 Paragraph 3.3.65 states that there is an urgent need for new electricity network infrastructure to meet the UK's energy objectives. Solar and wind are identified to play a large role in the net zero future. Paragraph 3.3.20 explains:

"Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to compromise predominantly of wind and solar".

Building Better Places: The Planning System Delivering Resilient and Brighter Futures – Placemaking and the Covid-19 Recovery (July 2020)

- 5.4.37 This describes the Welsh Government's planning policy priorities to support recovery following the Covid-19 pandemic crisis. One of its key messages is that a plan-led approach is the most effective way for the planning system to combat climate change. It states, '*we must identify, plan for and achieve key steps in achieving the switch to a decarbonised and climate resilient society*'.

Energy Wales: A Low Carbon Transition (March 2012)

- 5.4.38 This sets out how the Welsh Government intends to deliver on its ambition to create a sustainable, low carbon economy for Wales. It recognises that to deliver this ambition there needs to be investment, reinforcement and upgrading in Wales' energy infrastructure. This includes making the best use of renewable energy sources and also utilising energy storage technologies, to provide further scope for managing the intermittency and balancing supply and demand more effectively.

Guidance: Local and shared ownership of energy projects in Wales (June 2022)

- 5.4.39 Welsh Government published guidance for developers, local communities and decision-makers providing a benchmark for setting expectation between developers and stakeholders; a description of

good practices; as well as the opportunity for developers to be recognised for better projects. The guidance provides a framework to utilise Wales' abundant natural resources whilst ensuring projects are designed and delivered in harmony with the people and places that host them.

- 5.4.40 The guidance supports that target for at least one gigawatt of renewable electricity and heat capacity to be locally owned by 2030 and the expectation for all new energy project to have at least an element of local ownership from 2020. The guidance supports local stakeholders, developers and decision-makers to work together effectively.
- 5.4.41 The Welsh Government's objective is to retain social and economic benefits from future energy developments located in and around the coast of the country as Wales transitions to zero carbon. Furthermore, local ownership of all energy developments should provide Wales with a fair and proportionate share of benefit in return for hosting them; which will in turn contribute to the well-being of local people.
- 5.4.42 This guidance encourages engagement between developers and local stakeholders, enabling them to jointly identify and secure benefits by setting out:
- A clear benchmark for what developers and stakeholders can realistically expect from one another;
 - A description of what good practice look like, and how they will be delivered by all parties; and
 - The opportunity for developers to be recognised for better projects
- 5.4.43 The guidance provides a framework for identifying and including local stakeholders and potential partners in an engagement journey leading to:
- Pragmatic setting of stakeholder experience;
 - Maximised use of locally sourced cost-efficient services throughout the project lifecycle;
 - Shared understanding of the wider benefits of developments;
 - Better relationships with local communities reducing opposition to proposals and balancing that opposition with the 'silent majority' which typically supports or is neutral towards energy developments; and
 - Enhanced local awareness of the need and reasons for achieving net zero carbon goals and actions needed to achieve this.
- 5.4.44 The guidance sets out the critical relationship between the risks and the rewards of the process of developing and operating new energy projects and demonstrates the principle that early investment earns the right to greatest benefit. Developers and stakeholders can benefit mutually from sharing risk (including financial risks) appropriately, within the relevant regulatory frameworks.
- 5.4.45 The policy statement defines shared ownership as follows:

'Shared ownership' refers to a project owned by more than one legal entity. Examples exist where the ownership of a project is shared between a developer and a community group, individuals, landowners, or a public sector organisation. Shared ownership projects can involve more than one commercial organisation. However, in order to be considered as a shared ownership project under the target set by the Welsh

Government, we would expect one or more of the owning bodies to be in one of the categories included in the definition of 'local ownership'.

- 5.4.46 The policy statement highlights that all energy projects are required to meet the policy objective. Whether a project is based on fossil fuels, nuclear or renewable resources, or relates to energy by providing storage of carbon capture, an element of local ownership is required to meet the policy goal. Equally, project at all power ratings, occupying however small or large a physical space and at whatever capital cost will fall within the scope of the policy.
- 5.4.47 In respect of the engagement process, the policy statement highlights that strong engagement includes open dialogue, identification of common ground and update / clarification of commercial agreements as project develop. This engagement should lead to better outcomes both for the people of Wales and for developers.
- 5.4.48 The guidance states that dialogue should develop a shared understanding of development opportunities and limitations with the aim of delivering better projects. This dialogue might be instigated in two fundamental directions:
- Where a developer not meeting the definition for local ownership instigates a project, the engagement process must include an offer from the developer, inviting local stakeholders to enter into some form of local or shared ownership agreement; and
 - Where a local organisation leading a development may invite an experienced developer not meeting the definition of local ownership to share development risks and deliver more ambitious project than would be possible within the capabilities of the local developer.
- 5.4.49 In respect of local and shared ownership options, the guidance states that a range of corporate structures may be formed by both developers and local partners separately and, where joint ventures are formed, by developers and local partners together. The formation of such corporate bodies will progress iteratively as details of the shared ownership agreement develop, along with the proposed mechanisms for raising finance and the core governing articles of each lead organisation.
- 5.4.50 The guidance outlines that the local ownership working group has put forward a Collaborative Benefits Report (CBR) as a practical tool to improve transparency throughout the development process and increase the participation of all stakeholders. The guidance highlights how most development of any significance will attract both support and opposition. As such, the CBR provides a pathway of engagement, enabling developers and local stakeholders to understand each other's needs and an aspect of accountability to underpin mutually beneficial agreements and ultimately better projects.

5.5 Relevant Local Planning Policy

Denbighshire County Council Local Development Plan (2006 – 2021) (2013)

- 5.5.1 The DCC Local Development Plan was adopted in June 2013 and sets out the proposals and policies for the future development and use of land in Denbighshire. The LDP outlines a vision for how Denbighshire should develop stating:

'That Denbighshire, through sustainable development, will have a vibrant urban coast, with thriving market towns and rural areas. The housing and employment needs of the County will be met, the high quality environment protected and enhanced and a high quality of life maintained for all communities with full recognition that we have a strong Welsh language and culture that should be maintained and protected throughout the County.'

- 5.5.2 In addition, a series of objectives are set out within the LDP which identify issues and needs within Denbighshire. The LDP policies aim to address these objectives. Objective 11 refers to 'Energy' and confirms that:

'The Local Development Plan will ensure that Denbighshire makes a significant contribution to reducing greenhouse gases through both supporting the principle of large wind farm development within identified zones and other suitable renewable energy technologies, and ensuring that all new developments are built to minimise their carbon footprint.'

- 5.5.3 They key policies relevant to the proposal are:

- Policy RD1: Sustainable development and good standard design;
- Policy BSC3: Securing infrastructure contributions from Development;
- Policy PSE 5: Rural economy;
- Policy VOE 1: Key areas of importance;
- Policy VOE 2: Area of Outstanding Natural Beauty and Area of Outstanding beauty;
- Policy VOE 5: Conservation of natural resources;
- Policy VOE 6: Water Management;
- Policy VOE 10: Renewable energy technologies; and
- Policy ASA 3: Parking standards.

- 5.5.4 Policy VOE 10: Renewable energy technologies states that development proposals '*...which promote the provision of renewable energy technologies may be supported providing they are located so as to minimise visual, noise and amenity impacts and demonstrate no unacceptable impact upon the interests of nature conservation, wildlife, natural and cultural heritage, landscape, public health and residential amenity*'.

- 5.5.5 Policy PSE5: Rural Economy states that in order to sustain the rural economy, '*...tourism and commercial development, including agricultural diversification, will be supported throughout the County subject to detailed criteria, which include making a significant contribution to sustainable development and recognising the special status of the Area of Outstanding Natural Beauty / Area of Outstanding Beauty*'. The policy further highlights the need to sustain rural employment throughout the County and is recognised as relevant to considerations relating to sustainability and minimising environmental concerns.

- 5.5.6 Policy VOE 1: Key areas of importance affords protection to the following areas from development that would adversely affect them:

- Statutory designated sites for nature conservation;
- Local areas designated or identified because of their natural landscape or biodiversity value;
- Sites of built heritage; and
- Historic Landscapes, Parks and Gardens

- 5.5.7 Policy VOE 5: Conservation of natural resources states that *‘Development proposals that may have an impact on protected species or designated sites of nature conservation will be required to be support by biodiversity statement which must have regard to the County biodiversity aspiration for conservation, enhancement and restoration of habitats and species’*.

Supplementary Planning Guidance (SPG)

- 5.5.8 DCC have put together a series of SPGs which seek to amplify development plan policies and other issues in a clear and concise format underpinned by the aim of improving the design and quality of new development in the area. The SPG offer broad guidance aimed at assisting members of the public and officers in discussions prior to the submission of planning applications and assist officers and members in determining planning applications.

- 5.5.9 The following SPG are of relevance to this development.

Supplementary Planning Guidance (SPG): Renewable Energy

- 5.5.10 In April 2016, DCC published a SPG on renewable energy, stating how the Council supports the adoption of renewable energy technologies to address the effects of climate change. The SPG highlights that renewable energy technologies have an important role to play and can take advantage of the natural resources in Wales.
- 5.5.11 The SPG introduces the national and local policies concerned with the installation of renewable energy technologies (wind, water, solar, geothermal energy and plan materials (biomass)) and in particular onshore wind energy.
- 5.5.12 The SPG includes a section which details criteria for determining renewable energy schemes. Paragraph 8.2.2 of the SPG states that careful consideration will need to be given to its positioning as this can greatly influence any potential effects on landscape character and visual amenity. Further, paragraph 8.2.3 states that the development of the array will also need to be considered in terms of its design, the layout and future maintenance. The SPG acknowledges the importance of ensuring that the array is not shaded, but proposals will need to ensure that existing hedge lines and trees are not removed and if they must be, mitigation will need to be provided to offset these losses.

Supplementary Planning Guidance (SPG): Archaeology

- 5.5.13 In June 2013, DCC published a SPG document on archaeology. The SPG aims to ensure that *‘Applicants should take into account archaeological considerations and should discuss preliminary plans with the planning authority at an early stage’*.
- 5.5.14 The SPG highlights the various steps that will be necessary in developing a scheme:
- Consult local Sites and Monuments records to gather information about where archaeological remains are known or thought likely to exist, which will provide an early indication of the archaeological sensitivity of the Site;
 - If potential archaeological remains exist, arrange a field evaluation to be undertaken;
 - Once the information has been gathered by a variety of means, DCC will be in a position to comment on the application;
 - Where Nationally important archaeological remains and their settings, scheduled or not, are affected by development, there is a presumption in favour of preservation of the remain in situ. In

some instances it may be possible to preserve remains through the use of sympathetic designs; and

- On some occasions, DCC may determine the significance of the archaeological remains is not sufficient to justify preservation in situ. In such instances, DCC will need to satisfy themselves that the applicant has made adequate arrangements for the excavation and recording of the archaeological remains and the publication of the results.

Supplementary Planning Guidance (SPG): Clwydian Range and Dee Valley Area of Outstanding Natural Beauty

- 5.5.15 The DCC Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) SPG is '*...primarily targeted at individuals proposing new development and for decision makers involved in the management of the AONB*'.
- 5.5.16 The intention of the SPG is identify the importance of the AONB and seeks to raise the standard of new development and landscape design. It provides general principles which should be followed to assist new development proposals and will be a consideration when commenting on proposals. It also states that designers, developers, landowners and relevant organisations should have regard to this guidance when preparing plans, proposals or strategies.
- 5.5.17 The SPG states as a point of principle, new development should firstly seek to avoid any adverse impacts on the AONB before investigating mitigation measures and that it is crucial that new development proposals are informed by a thorough assessment of the surroundings and its setting.

Supplementary Planning Guidance (SPG): Conservation and Enhancement of Biodiversity

- 5.5.18 The purpose of this document is to '*...provide detailed guidance and advice to assist members of the public and the Council, prospective applicants and Officers*'.
- 5.5.19 The SPG highlights the crucial role the planning system plays in nature conservation and how rising demand for development land and changes to land management practices has led to an increased loss and fragmentation of habitats, disturbance of species, hydrological changes and an increased pressure on the natural environment.
- 5.5.20 It outlines DCC expectations with regard to the biodiversity information to be submitted with a planning application, scope and standards of submitted ecological surveys. The SPG states the ecological surveys and assessment works should be carried out at the early stages of project management to be able to amend the proposal's design, layout or plan in line with results and recommendations.

Supplementary Planning Guidance (SPG): Parking Requirements in New Developments

- 5.5.21 The SPG seeks to amplify the development plan, with the aim of improving the process, design and quality of new development, by providing more detailed guidance, which will assist members of the public, members of the Council and officers in discussion prior to any submission.
- 5.5.22 The guidance states that where major developments are proposed, car parking provision should be reduced, and the development should incorporate measures to further reduce reliance upon travel by car. Such measures should be detailed within the Travel Plan, produced by the applicant, which outlines measures that promote environmentally friendly forms of travel in preference to the car.

Supplementary Planning Guidance (SPG): Planning Obligations

- 5.5.23 The DCC Planning Obligations SPG intends to provide detailed guidance and advice to assist members of the public and the Council, prospective applicants and officers in discussions prior to submission of and, consequently, in applications for development.
- 5.5.24 The SPG states that development often creates a need for specific measures to mitigate impact, without which there could be a detrimental impact on local amenity and the quality of the environment. The SPG has been developed to help ensure that development contributes towards the provision of the necessary measures required to mitigate its impact, resulting in a high quality sustainable environment, where people to choose to live, work and play.
- 5.5.25 The SPG states that Planning Obligations are legally binding agreements entered into between a Local Authority and a developer and / or landowner. There are two types of planning obligations:
- Section 106 Agreement entered into by the Local Authority & the developer; and
 - Unilateral undertaking – commitment by the developer only.
- 5.5.26 The SPG states that planning obligations usually run with the land rather than the person entering into the agreement and are therefore enforceable against subsequent owners of the land.

Supplementary Planning Guidance (SPG): Trees and Landscaping

- 5.5.27 The SPG states that trees and hedgerows form an important part of our environment and in the delivery of sustainable development, the retention and the planting of new trees and hedges is crucial. It highlights that trees contribute considerably to the amenity of the landscape, add maturity to new developments, make places more attractive and help soften the built environment by enhancing views, by breaking up view lines and by screening unattractive buildings and undesirable views.
- 5.5.28 The SPG states that development proposals which would result in damage and / or inappropriate felling of significant trees and hedgerows will not normally be permitted. As such, planning conditions and Tree Preservation orders will be used to safeguard trees in appropriate cases. Any development proposed near to existing trees, woodlands or hedgerows must be in accordance with the design and protection principles contained within the SPG.

5.6 Replacement Denbighshire Local Development Plan

- 5.6.1 Under Section 69 (s69) of the Planning and Compulsory Purchase Act 2004 requires an LPA to undertake a review of an LDP and report to the Welsh Government at such times prescribed. DCC is in the process of preparing its Replacement LDP and the original Delivery Agreement for the replacement LDP was approved in May 2018 and work was progressing well. However there has been significant delays in the progression of the LDP.
- 5.6.2 In light of the of the delays, a revised Delivery Agreement was published by DCC setting out the submission of the LDP for examination to be May 2024, examination in May 2024-March 2025, the Inspector's report in June 2025 and the adoption of the replacement LDP in September 2025. However, the plan has not yet progressed to the Deposit stage.

6 Design and Access Proposals

6.1 Overview

6.1.1 This section of the PDAS takes forward key findings of the appraisal of context, leading to the design being influenced by a wide range of technical matters. The following matters are covered:

- Access;
- Character (including considerations of use, amount, layout, scale, appearance and landscaping;
- Community safety;
- Environmental sustainability; and
- Movement to, from and within the development.

6.2 The Design Response

6.2.1 Amendments have been made to the Proposed Development's red line boundary, specifically to take account of the Ancient Woodland that is located near to the site that is a sensitive allocation. In order to locate solar arrays in this area, the ancient woodland would have needed to be cropped. The amended site boundary should minimise potential environmental impacts and maximise the opportunity to provide mitigation and enhancement that serves the site. This enhancement will include the creation of off-site and onsite woodlands and pond improvements.

6.2.2 The changes to the site boundary are not anticipated to alter the conclusion of PEDW regarding the granting permission.

6.3 Access

6.3.1 Construction traffic will access the Site via the following route; via the A525 south off the A55, following the A525 south until the roundabout with B5381; and following the B5381 south-west to Cefn Meiriadog. During construction, it is anticipated that there will be four-two-way HGV movements generated per day. This is likely to be higher for the initial two weeks of the set-up of the Development which may rise to eight two-way movements across the course of the day. Once the Development is operational, it is expected that there will be one van accessing the Site twice per month. Further, access from Cefn Meiriadog will need widening to accommodate the movement of 16.5m large articulate lorries.

6.3.2 The Development incorporates sufficient spacing between the solar modules and associated equipment to facilitate any necessary access for maintenance. In light of the above, it is considered that the Development is fully compliant with local policy.

6.4 Layout

6.4.1 The location of the Development is shown on the Site Location Plan and Site Layout Plan. The plans show the context of the Development in the wider area, including nearby residential buildings and other uses.

- 6.4.2 The Site Layout Plan demonstrates the arrangement of the equipment, which has been carefully considered to ensure any potential significant effects are minimised. A number of inherent mitigation measures have been incorporated into the design, which are detailed below within section 7.
- 6.4.3 The Site Layout Plan shows the arrangement of the solar arrays and transformers. The layout has been carefully considered to ensure any potential significant effects are minimised. A number of inherent mitigation measures have been incorporated into the design, which include the following:
- Seeking to set panels away from existing features and habitats such as hedgerows and trees,
 - Incorporating habitat and biodiversity opportunities within the layout,
 - Perimeter buffer is proposed to minimise visibility from the surrounding area;
 - Appropriate fencing to ensure security; and
 - Strategic placement of equipment within the Site to ensure enough distance between each piece of equipment in order to facilitate maintenance operations.
- 6.4.4 These technical considerations have been balanced against other environmental considerations associated with the Development.

6.5 Scale and Appearance

- 6.5.1 The Development covers an area of approximately 35.42 hectares and will consist of modules and associated infrastructure:
- Solar panels mounted on metal frames, secured to the ground by metal poles (piling depths typically between 1.5m and 2m). The maximum height of the panels will be 3 metres above ground level. The panels will face due south and will be dark blue or black in appearance. The lowest edge of the panels will be a minimum of 90cm above the ground and they will be positioned in rows with approximately 4.5 metres of space from front to back to ensure the land can remain in agricultural use (grazing);
 - The solar panels will be electrically connected to the DNO substation . These cables would be laid underground (where possible) in trenches running adjacent to the on-site access tracks. In order to connect the two parcels of land a connection cable will be installed below ground, with directional drilling in certain areas to avoid significant environmental effects;
 - A DNO Substation approximately 4m in height and 5.7m x 5.7m
 - 2no Customer Substations approximately 4m in height and 6.5m in length x 4.2m in width located on either parcel of land
 - 5no Transformer Stations approximately 2.5m in height and measuring 6.1m x 2.5m located around the site
 - Internal access tracks made of crushed, permeable stone will be developed across the Site.

6.6 Landscaping

- 6.6.1 The application will be supported by a LVIA. The principal elements of the landscape assessment comprise an analysis of the physical context of the Site, a summary of key planning policy and evidence base relevant to the Development, an appraisal of the landscape features and character of the Site and the Site's surroundings and the wider landscape.
- 6.6.2 The Development's restricted height, unsubstantial massing, and absence of any perceptible activity limit the potential for adverse landscape and visual effects. Furthermore, through the LVIA process, the layout of the Development has been guided by a robust understanding and analysis of the landscape to respond sensitively to the landscape and visual context, with the aim of reducing or where possible avoiding significant landscape and visual effects.
- 6.6.3 The Site is currently well screened by the existing woodland that will in turn surround the Development. Furthermore, additional planting can be agreed with the LPA over the course of the determination period.

6.7 Community Safety

- 6.7.1 The Development is static in nature and does not involve the use of any hazardous substances, and as such there are no immediate risks to public safety. In addition, a number of infrared CCTV cameras will be installed as part of the Development. Furthermore, security fencing will surround the Site. Finally, the Development will not affect any existing PRoW.

7 Assessment of the Development

7.1 Overview

7.1.1 This chapter of the PDAS provides an assessment of the key matters to be considered in the planning balance for the Development. The chapter demonstrates the acceptability of the Development. The section is focussed on the following key matters:

- Principle of the Development;
 - Landscape and Visual Amenity;
 - Heritage;
 - Glint and Glare;
 - Biodiversity;
 - Arboriculture;
 - Flood Risk and Drainage;
 - Transport and Access;
 - Agricultural Land Classification; and
- Compliance with Future Wales;
- Compliance with the Well-being of Future Generations (Wales) Act 2015.

7.1.2 The planning assessment presented below tests the Development against the policy provisions of Future Wales, the highest tier of the development plan in Wales, the most recent expression of national policy for renewable energy and the principal policy for decision-making on DNS's. The assessment also considers the provisions of local policies contained in the DCC LDP (despite being prepared prior to the adoption of Future Wales), other national planning and energy policy, and PPW as material considerations to the decision-making process.

7.2 Principle of Development

7.2.1 Both the UK and Welsh Government declared a climate emergency in 2019. The Welsh Government accepted CCC's recommendation of a target of at least a 95% reduction in greenhouse gas emissions by 2050, stating its intention of going further to '*bring forward a target for Wales to achieve Net Zero emissions no later than 2050*'. Furthermore, the Net Zero target has been enshrined into law by the UK Government and in parallel with this advice to the Welsh Government, CCC has recommended that the UK should adopt an ambitious 78% reduction target, compared to 1990 level across the Sixth Carbon Budget (2033 – 2037) period on the pathway to Net Zero emissions by 2050.

7.2.2 The Welsh Government published their Climate Change Strategy in 2010, which outlined a commitment to reduce greenhouse gases by 40% in all sectors by 2020 from 1990 levels. However, Welsh Government data⁴ shows that there has been a 12% reduction in emissions from the 1990

⁴ Greenhouse Gases | Air Quality In Wales (gov.wales)

baseline of 55 mega tonnes CO₂, which is equivalent to 48 mega tonnes in 2016. Based on this trajectory, a 40% reduction from 1990 levels is unlikely to be met.

- 7.2.3 A Written Statement⁵ prepared by the Welsh Government in June 2022, stated that whilst an average reduction of 28% in emissions had been achieved compared to 1990 baseline, *'now both the energy crisis of living crisis show Wales needs to double down on efforts'*. As such, according to the Welsh Government, Wales is behind its net zero target by 2050. Evidence provided by CCRA3 highlights that the effects of climate change are already being felt in Wales, demonstrated by rising sea levels and increases in extreme heat events, highlighting the need for greater urgency in decarbonisation efforts. In June 2022, the CCC provided an update report which stated that tangible progress is lagging behind the policy ambition and greater emphasis and focus must be placed on delivery.
- 7.2.4 Welsh energy policy highlighted that renewable energy development is a key contributor to the net zero target. Prosperity for All: A Low Carbon Wales⁶ seeks to accelerate the deployment of renewable generation stating that *'The reduction of electricity generation from fossil fuels must be accompanied by increases in low carbon generation'*. At UK level, the National Infrastructure Strategy⁷ states that *'...infrastructure investment is fundamental to delivering net zero emissions by 2050'* and that *'To deliver net zero, the share of generation from renewables needs to dramatically increase'*. Furthermore, as a consequence of the increased usage of electric cars and vans and the increased use of clean electricity, the Energy White Paper⁸ states that by 2050 overall demand for electricity could double. As a consequence, this would require *'a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target'*.
- 7.2.5 The Clean Power Action Plan 2030 published in December 2024 and updated in April 2025, reiterates the established need for a rapid deployment of new clean energy setting an ambitious target of 45-47GW of solar power to be achieved by 2030. To achieve these targets, it is clear that considerable growth in large scale solar farms will be necessary and this cannot be achieved solely by the use of brownfield land or roof top installations.
- 7.2.6 As well as helping to address climate change, renewable energy has a key role to play in providing greater energy security for the country and reducing our need to import energy, as advocated in the British Energy Security Strategy (April 2022) and NPS EN-1 and EN-3.
- 7.2.7 Denbighshire County Council declared a Climate Change and Ecological Emergency in July 2019. In response and by 31 March 2030 the Council aims to become a Net Carbon Zero Council and Ecologically Positive Council. The proposed development would make a valuable contribution to achieving these targets.
- 7.2.8 LDP Policy VOE 10 supports renewable energy proposals where they are located to minimise visual, noise and amenity impacts and demonstrate no unacceptable impact upon the interests of natural conservation, wildlife, natural and cultural heritage, landscape, public health and residential amenity.

Compliance with Planning Policy

- 7.2.9 The support for the principle of renewable energy development is clear in planning policy in Wales, primarily through Future Wales and PPW at the national level and the DCC LDP at the local level.

⁵ New stats: Wales is on track for climate targets, but big changes lie ahead in 'decade of action' | GOV.WALES

⁶ Low Carbon Delivery Plan

⁷ UK National Infrastructure Strategy

⁸ Energy White Paper (publishing.service.gov.uk)

- 7.2.10 Future Wales highlights the key role that the planning system plays in delivering a decarbonised and resilient Wales through energy generation. More specifically, Policy 17 of Future Wales outlines the Welsh Government's strong support for the principle of developing renewable and low carbon energy from all technologies and at all sectors to meet Wales' future energy needs. Policy 17 also states that in determining applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and targets to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.
- 7.2.11 Welsh Government figures⁹ states that the renewable share of Wales' total electricity generation increased from 25% in 2018 to 27% in 2019. Further, the report states that renewable generation is now equal to 51% of electricity consumption in Wales, which highlights that achieving the 70% target by 2030 is challenging. The significant weight placed on the need to meet Wales' renewable energy targets is evident in recent decisions taken by Welsh Ministers in respect of other DNS applications¹⁰.
- 7.2.12 PPW is also explicit in its support for the principle of the Development. Paragraph 3.30 highlights the key role the planning system plays in tackling the climate emergency through the decarbonisation of the energy system. Section 5.7 states that *'The Welsh Government's highest priority is to reduce demand wherever possible and affordable. Low carbon electricity must become the main source of energy in Wales'* and significant investment is required in energy generation, transmission and distribution infrastructure, in order to ensure future demand can be met. Furthermore, the benefits of renewable and low carbon energy as part of the overall commitment to tackle the climate emergency and increase energy security is of paramount importance.
- 7.2.13 The Development will have an installed generating capacity of over 23MW, which will contribute to the generation of low carbon electric in Wales and as such is strongly support in principle by Future Wales and PPW, due to its role in tackling the climate emergency and increasing energy security.
- 7.2.14 At the local level, the principle of renewable energy is supported by the DCC's LDP, including Policy VOE 10 (Renewable energy technologies) and Policy VOE 5 (Conservation of natural resources). It should however be notes the DCC's LDP was adopted before the publication of Future Wales, which has primacy in the planning policy hierarchy.
- 7.2.15 Finally, the Development is compliance with Policy 17 of Future Wales as it states that significant weight should be given to these targets. The Development is clearly in compliance with (and heavily support by) national and local policy in relation to energy development and the principle of the Development is accepted.

7.3 Landscape and Visual Amenity

- 7.3.1 Criteria 1 of Policy 18 of Future Wales states that renewable and low carbon energy projects qualifying as DNSs will be permitted where the proposal does not have unacceptable adverse impacts on the surrounding landscape (particularly on the setting of Areas of Outstanding Natural Beauty (now National Landscape)).
- 7.3.2 An LVIA has been undertaken to accompany the application in accordance with the Guidelines for Landscape and Visual Impact Assessment.
- 7.3.3 A series of mitigation measures have been embedded in the design from the outset, with the aim of reducing adverse effects resulting from its introduction into the surrounding landscape and visual context. These mitigation measures include both the landscape proposals and the layout of the

⁹ energy-generation-in-wales-2019.pdf (gov.wales)

¹⁰ Wauntysswg Solar (DNS/3213639), Llanwern Solar (DNS/3213968), and Penderi (DNS/321364)

proposed panels and ancillary structure. The design of the Proposed Development has evolved as part of an iterative process and has been informed by the findings of the baseline landscape and visual amenity conditions.

- 7.3.4 An assessment of the likely landscape, townscape and visual effects of the Proposed Development has been undertaken for Years 1 and 15 of operation.
- 7.3.5 At Year 1, four landscape receptors will be subject to significant effects (in this case, moderate adverse) as a result of the Proposed Development: Geological Landscape AA Cefn Meiriadog; Historic Landscape AA Bont-newydd; the character of the Site; and open fields. The remaining 27 landscape receptors will not be subject to significant effects, and three of these will be subject to negligible beneficial effects: native hedgerow; canopy trees; and waterbodies. One visual receptor will experience significant effects (in this case, moderate adverse) as a result of the Proposed Development: users of the north/south lane that runs between the parcels. The remaining 14 visual receptors will not experience significant effects. Effects on the National Landscape and visual receptors within it will not be significant.
- 7.3.6 At Year 15, following the establishment of the proposed landscape strategy, none of the landscape receptors will be subject to significant residual effects as a result of the Proposed Development. Four landscape receptors will be subject to minor beneficial residual effects: Landscape Habitats AA Cefn Improved Grassland; native hedgerow; canopy trees; and waterbodies. None of the visual receptors will experience significant residual effects. Residual effects on the National Landscape and visual receptors within it will not be significant.
- 7.3.7 While the Proposed Development will result in some significant adverse landscape and visual effects, these are related to effects assessed before secondary mitigation measures are factored in. Effects on the National Landscape and visual receptors within it will not be significant, either at Year 1 or Year 15.
- 7.3.8 On the basis of the above, and the findings of this assessment, it is considered that the Site has the capacity to accommodate the Proposed Development without undue harm on the landscape character and visual amenity of the Site and the wider area. It is further considered that the Proposed Development will lead to tangible long term benefits on the landscape features of the Site.

7.4 Heritage and historic environment

- 7.4.1 Criterion 6 of Policy 18 of Future Wales states that renewable and low carbon energy projects qualifying as DNSs will be permitted provided that the proposal does not have unacceptable adverse impacts on statutorily protected built heritage assets. Paragraph 6.1.9 of Section 6 of PPW requires that planning decisions fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place. The Heritage Statement meets this PPW requirement.
- 7.4.2 The Historic Environment Desk-Based Assessment identified the heritage assets and features in the area, none of which are located within the site and the majority of assets are clustered within the main St Asaph settlement area. The Assessment also considers archaeological features. The assessment having been undertaken in accordance with CADW best practice.
- 7.4.3 The assessment considers the historic environment both within the Site and its wider surroundings and identifies historic assets within the Site or any historic assets beyond the Site boundary that may potentially be affected by the development proposals. Both physical and non-physical effects, as a result to changes in setting of designated assets, are then assessed.

- 7.4.4 It concludes the footprint of the proposed development would not directly impact upon any designated historic asset, or previously recorded non-designated historic asset. Geophysical surveys, covering the entire Site boundary, have not recorded any anomalies of an archaeological origin within the Site. These conclusions having been supported by CADW and HENEB in their pre-application response, which also confirmed that no further archaeological or heritage work is required.
- 7.4.5 The geophysical surveys recorded both post-medieval and modern agricultural features within the Site, which include ridge and furrow, drainage features, and modern cultivation remains. Such remains would retain little, if any, evidential interest and would be of accordingly low significance. The examination of such remains under archaeological conditions would contribute little further to our understanding of the agricultural practices of these periods and / or of local land-use. Such remains would not be anticipated to comprise assets of the highest significance, and they would not warrant preservation in situ or otherwise preclude development within the Site.
- 7.4.6 Following PAC comments from Cadw and Heneb, the Historic Environment Desk-Based Assessment was updated to clarify the extent of cable works to connect to the St Asaph substation and that an archaeological watching brief would be implemented along Glascoed Road (as a roman road).
- 7.4.7 The proposals result in no harm to the significance of any historic assets within the Site environs as a result of changes to setting. This includes the Lower Elwy Valley Registered Historic Landscape (HLW (C) 4) and the Scheduled Monument of Bedd-y-Cawr Hillfort (DE037). In all cases, the key contributing interests to the significance of those historic assets, and the key views towards and from them (including from 'third points'), would be preserved under the proposals. The ability to appreciate their significance would also be preserved.
- 7.4.8 Overall, the proposals would be consistent with the provisions of the Planning (Listed Buildings and Conservation Areas) Act (1990), Section 66(i), the Historic Environment (Wales) Act (2016), Section 6.1 of Planning Policy Wales (2024), as well as the relevant provisions of the Denbighshire County Council Local Development Plan (2013 – 2021).

7.5 Glint and Glare

- 7.5.1 Criterion 2 of Policy 18 in Future Wales states that renewable and low carbon energy projects qualifying as DNSs will be permitted provided that the proposal does not have unacceptable visual impacts on nearby communities and individual dwellings.
- 7.5.2 The Solar Photovoltaic Glint and Glare Study concluded that solar reflections are geometrically possible towards 40 of 48 assessed dwellings. Screening in the form of existing vegetation, buildings and intervening terrain is predicted to significantly obstruct views of reflecting panels for 36 dwellings, such that no impact is predicated. Mitigation is not required for these dwellings.
- 7.5.3 For the remaining four dwellings, solar reflections are geometrically possible for more than three months per year but less than 60 minutes on any given day. Screening in the form of existing vegetation is predicted to partially obstruct views of reflecting panels, with marginal views from above ground level considered possible. The resultant duration of effects is predicted to be reduced to less than three months per year. A low impact is predicted for these four dwellings, and mitigation is not recommended.
- 7.5.4 In respect of impacts on roads, the study showed that solar reflections towards the B5381 are predicted to be obstructed by existing vegetation and intervening terrain, such that no impact is predicted upon road users. No impact is predicted and therefore mitigation is not required.

- 7.5.5 As such, the Development meets the requirements of Policy 18 in that *‘there are no unacceptable adverse impacts by way of...reflected light...’* and *‘there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar...’*. Furthermore, the Development will be in accordance with Policy VOE 10 of the LDP as it as there will be *‘...no negative impact on the designation of there is an overriding public need for development’*.

7.6 Biodiversity

- 7.6.1 Criterion 3 and 4 of Policy 18 of Future Wales states that renewable and low carbon energy projects qualifying as DNSs will be permitted where the proposal does not have an unacceptable adverse impact on internationally designated sites and the features for which they have been designated, or on national statutory designated sites for nature conservation, protected species and habitats. In addition, Criterion 5 of Policy 18 requires that the proposal includes biodiversity measures to provide a net benefit for biodiversity.
- 7.6.2 An Ecological Impact Assessment (EclA) has been prepared by SLR Consulting and is submitted as part of the application. This sets out the work that been undertaken from an ecological perspective. The EclA is supported by a range of habitats and species surveys including those relating to badgers, bats, Great Crested Newts and amphibians, for example. Further ecological detail is included within the Environmental Statement context chapters, although biodiversity itself is not a matter where significant environmental effects are expected and therefore biodiversity is not included within the ES technical chapters.
- 7.6.3 The EclA concludes that the Proposed Development is predicted to have no significant residual effects in relation to any important ecological receptors.
- 7.6.4 The mitigation and enhancement measures discussed in the EclA are predicted to have a positive effect at Local level on abundance of hedgerow habitat and positive effect of up-to County level on pond habitats. Protected species, including GCN, breeding birds, bats, badgers and hazel dormouse are also predicted to benefit from the biodiversity enhancements incorporated into the Site design.

7.7 Arboriculture

- 7.7.1 No trees within the Site are protected by tree Preservation Orders or are located within a Conservation Area. An area of ‘Plantation on Ancient Woodland Site’ is noted.
- 7.7.2 SLR Consulting Limited has carried out a Tree Survey and Arboricultural Impact Assessment in accordance with BS 5837:2012 ‘Trees in Relation to Design, Demolition and Construction Recommendations’ on the 18th May 2023 with a follow up survey carried out from the 11th-13th February 2025.
- 7.7.3 The survey records all trees within and adjacent to the Site, recording a number of parameters including species, crown spread and Root Protection Area (RPA). The extent of the RPA is calculated in accordance with BS 5837:2012 and is an important metric for understanding the impact a proposal will have on tree removal and retention and how to protect those trees retained.
- 7.7.4 The survey recorded:
- One hundred and sixteen individual trees (fifty-two Category A, thirty-nine category B, seventeen category C and eight category U trees).
 - Twenty-three tree groups (nine category A, nine category B and five category C).

- Twenty-six category C hedgerows.

- 7.7.5 In accordance with standing advice from Forestry Commission England and Natural England, a minimum 15-metre buffer has been implemented from the edge of both areas of ancient woodland. This buffer is intended to protect the ecological integrity of the woodland and its associated root protection areas.
- 7.7.6 The 'Plantation on Ancient Woodland Site' is shown within the tree survey schedule and on the Tree Constraints Plans as G12. There is also an area adjacent to the site referred to as G67 that is listed as 'Restored Ancient Woodland Site'.
- 7.7.7 The majority of trees, tree groups and hedgerows are to be retained. It is necessary to remove a small number of trees to enable the development, however, trees to be removed are of poorer quality and their replacement will be offset by extensive replacement planting. Whilst the layout has been designed to utilise existing hedgerow gaps and field access point there is a need to removed small areas of hedgerow in a very limited number of locations to enable access between the parcels of land. Replacement hedgerow planting is proposed to offset losses, where necessary.
- 7.7.8 In areas where access tracks pass close to retained trees or within the identified RPAs a less intrusive form of construction will be used which utilises geo-cellular type matting to reduce the extent of ground works. Such an approach is entirely appropriate and deliverable, and will not adversely affect the retained trees.
- 7.7.9 This is in line with the relevant national and local policy including the Denbighshire Trees and Landscaping SPD.

7.8 Flood Risk

- 7.8.1 The TAN 15 Development Advice Map¹¹ indicates that the Site lies entirely within an area considered to be at '*little or no risk of fluvial or coastal/tidal flooding*' (Flood Zone A). As such, with reference to Planning Policy Wales and its associated TAN15, the justification test is not applicable and there is no need to consider flood risk further. The Acceptability Criteria for the Development in Flood Zone A states that no increase in flooding is to be caused due to the Development. In light of this, a Flood Consequences Assessment (FCA) has been carried out for the Development in accordance with guidance contained in PPW and TAN 15.
- 7.8.2 Criteria for development in Flood Zone A states that no increase in flooding is to be caused due to the Development. The FCA identifies and assesses the risks of all forms of flooding to and from the Development and demonstrates how these flood risks will be managed so that the Development remains safe throughout the operational period taking climate change into account.
- 7.8.3 The FCA outlined a number of potential sources of flooding, which are discussed below:
- **Flooding from River or Fluvial Flooding and from Sea or Tidal Flooding:** With reference to the Development Advice Map, the Site lies wholly within Flood Zone A and is therefore outside an area having less than 0.1% Annual Exceedance Probability or less than 1 in 1,000-year annual probability of flooding from fluvial and tidal sources. Flooding from these sources is very low and not considered further;
 - **Flooding from Surface Water or Pluvial Flooding:** The FCA has identified areas at risk of flooding within the Site as linear and often extending beyond the Site boundary. These areas at

¹¹ Available at: Welsh Government <https://naturalresources.wales/floodriskmap>

risk of flooding are therefore considered to be flow paths. As these flow paths have relatively small upstream catchments, the resulting overland flow and associated flood extent is expected to be limited. The risk of flooding from this source is therefore considered low and not considered further. Furthermore, it should be noted that these conveyance routes will nonetheless be retained as part of the Development thereby maintaining the existing hydrological and hydraulic regime;

- **Flooding from Groundwater:** Flooding from this source is not considered to be significant and therefore not assessed any further;
- **Flooding from Sewers:** No mains water pipes or wastewater sewers were recorded in the vicinity of the Site during the site visit. Flood risk from sewers is therefore zero;
- **Flooding from Reservoirs, Canals and Other Artificial Sources:** There are no reservoirs up gradient of the site and therefore flooding from this source is zero. Flooding from Reservoirs, Canals and Other Artificial Sources is negligible; and
- **Flooding from Infrastructure Failure:** The Site is not afforded protection from flood defences, nor are there any sewerage pumping stations or other significant infrastructure within the vicinity of the site which may post a flood risk. Flooding from infrastructure failure is therefore considered very low.

7.8.4 In summary, the FCA has assessed the potential for flooding occurrences across various sources of flooding. Owing to the Site's position entirely within a Flood Zone A area, the Site has been classified as being not at significant risk of flooding.

7.9 Drainage Strategy

7.9.1 A Drainage Strategy has been prepared and will accompany to the application. The Drainage Strategy proposes to utilise sustainable drainage systems (SuDS) and that adequate SuDS space provision is afforded within the Development. The Development is feasible and compliant to appropriate practice and regulatory requirements.

7.9.2 Considering the findings of both the FCA and Drainage Strategy, which are submitted as together as part of the application, the assessment concludes that the Site can accommodate the development in compliance with PPW, TAN 15, the Welsh Government Sustainable Drainage Systems Standards for Wales and LDP Policy MD7 (Environmental Protection).

7.10 Transport and Access

7.10.1 Criterion 9 of Policy 18 in Future Wales states that renewable and low carbon energy projects qualifying as a DNS will be permitted providing that there are no unacceptable adverse impacts on the transport network though the transportation of components or source fuels during its construction and/or ongoing operation.

7.10.2 Whilst preparing the Transport Assessment, both local and national transport policy have been reviewed in respect of the Development. The Development has undergone extensive highways planning which has enabled a safe and suitable access to be identified whereby any highways safety issues have been mitigated.

7.10.3 Construction traffic will access the Site via the A525 south off the A55, following the A525 south until the roundabout with B5381; and following the B5381 south-west to Cefn Meririadog. During construction, it is anticipated there will be on average four-two-way HGV movements per day. This is likely to be slightly higher for the initial two weeks of the site set-up rising to eight two-way movements

across the course of the day. Once the Development is operational, it is expected that there will be one van accessing the Site twice per month. Access from Cefn Meiriadog will be widened to accommodate 16.5m articulate lorries.

7.10.4 The Transport Assessment concludes the site can be safely accessed by construction and operational vehicles and at which the temporary traffic impacts during the construction phase can be minimised. Traffic management measures can be put in place to reduce or avoid potential impacts. During the operational phase, the Development will have an imperceptible effect and would certainly not lead to severe impacts to the existing operation and free flow of traffic on the adjoining highway network.

7.10.5 Additionally, the application will be supported by a CTMP which outlines a range of measures that will be undertaken to ensure that the Development will not jeopardise highways safety on the local network. The CTMP provides accurate details of construction trips and measures within the CTMP include the following:

- All construction traffic will have to follow a specific route via the A525 and the B381 and not through local settlements;
- Deliveries will occur on 40 tonne HGVs. All HGVs will be coordinated to be 'just in time' to control traffic flow;
- Temporary road signs warning of construction vehicle activity in the vicinity of the access points (along unnamed access road).
- Construction works will be restricted by take place between 8am – 6pm.
- Deliveries will be further managed to arrive and depart in 30 minute intervals.
- Dedicated staff parking and compound areas.
- Wheel washing facilities. HGVs will be asked to pull up away from the Site where they will be required to call ahead to ensure the route is clear, thereby preventing the potential for construction traffic;
- There will be up to 20 operatives on the Site during the peak construction period, thereby, to reduce traffic onto the Site, the operatives will be encouraged to share vehicles.

7.10.6 In submitting this application the applicant has considered comments made at PAC stage related to the use of particular roads and suitability of those roads. No physical changes to the development are proposed, however, the TS and PAC Report provide further clarification on key matters in response to the comments. For example, concern was raised at the width and visibility along the highway from Glascoed Road to the site however the TS confirms the route is appropriate and can safely accommodate the very low levels of traffic proposed. It is also noted the road is already used by larger vehicles and farm traffic yet there are no particular instances of major accidents or collision. A road condition survey will also be completed, as referred to in the highways comments..

7.10.7 The Development meets the objectives of Policy 18 of Future Wales, PPW 11 and policies VOE 10 (Renewable energy technologies) and VOE 5 (Conservation of natural resources).

7.11 Agricultural Land Classification

7.11.1 Policy 18 of Future Wales policy 18 does not include a criterion which relates to agricultural land. However, PPW paragraph 3.58 highlights that the BMV agricultural land, should be conserved as a finite resource for the future. Furthermore, paragraph 3.59 states that BMV should only be developed if

there is an overriding need for the Development and either previously developed land or land in lower agricultural grades is unavailable. PPW seeks to conserve the BMV resource, however it does not require BMV land to be used in any particular way or at any particular intensity.

- 7.11.2 An Agricultural Land Quality survey was undertaken in order to determine the quality of the land which is subject to this application. The report is based on a survey of the land in January 2022, with additional surveys in September 2023 and December 2024. The surveyed land covers a wider area than the current boundary. The survey confirms the site is **not Best and Most Versatile Land**.
- 7.11.3 The agricultural land grade has been assessed as 32.4 ha of subgrade 3b (99% of the land) and 1 ha of other land. The subgrade 3b comprises all of the agricultural land within the Site. The moderately high clay content of the topsoil combined with poor drainage means that access to land is rarely possible with machinery during winter and spring. Arable use of the land is usually limited to autumn-sown combinable crops.
- 7.11.4 As such, the proposed development is entirely aligned with national and local policy in that it utilises non-BMV land. Furthermore, as the Proposed Development constitutes temporary works, there will be no permanent loss of BMV land and indeed the cessation of arable use for the 40 year period can improve overall soil quality in the long term. Finally, once the solar array is removed, the land will be returned to its original use and in an improved condition.
- 7.11.5 The principle of Development is strongly supported in national and local policy, and as such, the overriding need for renewable and low carbon energy development is established. Furthermore, this is demonstrated in decisions in other DNS applications¹².

7.12 Summary of Compliance with Planning Policy

- 7.12.1 This policy appraisal has considered the key planning issues associated with the Development. The principle of Development is unequivocally supported by national and local planning policy.
- 7.12.2 Policy 17 of Future Wales provides strong support for the principle of developing renewable and low carbon energy and in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and the Welsh Government's target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.
- 7.12.3 In considering the planning assessment undertaken, the Development complies with the criteria set out in Policy 18 of Future Wales which provides the decision-making framework for renewable and low carbon technologies. The Development is therefore clearly acceptable in relation to the policy tests set by Future Wales and should be approved.

7.13 Compliance with the Well-Being of Future Generations (Wales) Act 2015

- 7.13.1 In accordance with the sustainable development principle in Section 3 of the Well-Being of Future Generations (Wales) Act 2015, the Development would improve the economic, social, and cultural well-being of Wales. Furthermore it accords with one or more of the Welsh Ministers' well-being objectives set out as required by Section 8 of the Well-Being of Future Generations (Wales) Act 2015.
- 7.13.2 Section 5 of PPW explains ways in which places can contribute to each of the seven goals of the Well-Being of Future Generations Act, including:

¹² Wauntysswg (DNS/3213639), Llanwern (DNS/3213968), Penderi (DNS/321364), Wentlooge (DNS/3216558), and Blackberry Lane (DNS/3245065)

- A **Prosperous Wales** can be achieved through increased economic activity across all sectors and at all scales;
- A **Resilient Wales** is supported by agriculture and tourism industries and through the beauty of Wales' natural, built and historic environment;
- A **Healthier Wales** can be achieved through the reduction in emissions and air pollution as a result of generating energy from non-carbon sources;
- A more **Equal Wales** can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all;
- **Cohesive Communities** are created by people who have access to fulfilling work which is easily reached locally through sustainable transportation infrastructure and who can communicate effectively and safely with their friends and neighbours;
- A **Vibrant Culture and thriving Welsh Language** are supported by the provision of jobs and economic activity which needs to be strategically planned and managed;
- Above all, a **Globally Responsible Wales** is promoted by reducing Wales' carbon footprint through integrated public transportation infrastructure, encouraging globally responsible businesses and the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised.

7.13.3 Given the benefits of the Development (renewable energy generation, decarbonisation, economic impact and job creation / safeguarding for the local workforce), the Development is clearly in accordance with the Well-Being of Future Generations Act.

8 Conclusion

- 8.1.1 This PDAS supports a DNS application submitted on behalf of Anesco for the construction, operation and decommissioning of an 18.44MW ground mounted photovoltaic solar farm, with associated equipment, infrastructure and ancillary works. The Development is proposed for a 40 year period.
- 8.1.2 It is capable of powering almost 5,000 homes which in turn saves 4,267 tonnes of carbon per annum compared to traditional fossil fuels.
- 8.1.3 As the Development comprises an electricity generating station with an installed generating capacity of between 10 and 350 MW, it falls within the definition of a 'Development of National Significance' (DNS) under regulation 4 of the Development of National Significance (Specified Criteria and Prescribed Secondary Consents (Wales) Regulations 2016, for the purposes of s62(D) of the Planning Wales Act.
- 8.1.4 The project has been subject to statutory and non-statutory consultation, with statutory consultation (at the Pre-Application Consultation stage) being undertaken in accordance with the relevant Regulations and following notification and consultation with the necessary stakeholders and interested parties. The response to the PAC is set out in the PAC Report.
- 8.1.5 Future Wales is clear that decision-makers must give significant weight to Wales' need to meet international commitments and its own target of generating consumed electricity by renewable means by 2030. The development contributes to this key objective in line with Policy 17 of Future Wales. It is also fully compliant with Policy 18 of Future Wales.
- 8.1.6 The Clean Power Action Plan 2030 reiterates the established need for a rapid deployment of new clean energy setting an ambitious target of 45-47GW of solar power to be achieved by 2030. To achieve these targets, it is clear that considerable growth in large scale solar farms will be necessary. Renewable energy is also critical in providing greater energy security and reducing our need to import energy, as advocated in the British Energy Security Strategy (April 2022) and NPS EN-1 and EN-3.
- 8.1.7 Denbighshire County Council declared a Climate Change and Ecological Emergency in July 2019. In response and by 31 March 2030 the Council aims to become a Net Carbon Zero Council and Ecologically Positive Council. The proposed development would make a valuable contribution to achieving these targets.
- 8.1.8 The Development will not result in any unacceptable adverse impacts with the only arguable matter of 'conflict' with the plan being the location of development outside settlement boundaries. However, clearly, it is necessary for development of this type and scale to be located in countryside locations (i.e., outside of settlements).
- 8.1.9 The site is visually well screened from a range of local receptors and viewpoints and will not result in any notable adverse effects on the landscape or visual appreciation of the area. In particular, there will be no noticeable change to the landscape when viewed from the nearby National Landscape.
- 8.1.10 It is therefore a site and location which is ideally suited to the proposed development, being in proximity to a sub-station with available capacity, and being largely unconstrained in technical terms and not covered by notable designations. Notably, it is not BMV agricultural land. Furthermore, the temporary nature of the development which means any loss of soils is temporary and reversible
- 8.1.11 The Development is in accordance with local and national planning policy and will make a significant contribution to the transition to a renewable energy system and the delivery of net zero. Accordingly, it can be concluded that the Development should be granted planning permission.